

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RUTH V. BRIGGS,	.	
	.	Case No. 1:16-cv-248
Plaintiff	.	
	.	
vs.	.	601 Market Street
	.	Philadelphia, Pennsylvania 19106
	.	July 17, 2018
	.	
TEMPLE UNIVERSITY,	.	
	.	
Defendants.	.	
.		

TRANSCRIPT OF TRIAL
DAY 2 - A.M. SESSION
BEFORE THE HONORABLE ROBERT F. KELLY
UNITED STATES DISTRICT JUDGE
AND A JURY

APPEARANCES:

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1 (Proceedings commence at 9:23 a.m.)

2 (Jury not present)

3 THE COURT: Good morning.

4 COUNSEL: Good morning. Good morning, Your Honor.

5 THE COURT: You may be seated.

6 You had something you wanted to go over before --

7 MR. HARRIS: Counsel does.

8 THE COURT: Yes.

9 MS. MATTIACCI: Oh, yes, Your Honor. I was just
10 handed a document by the defense that was never produced in
11 discovery, was not put on the trial exhibit list. And
12 apparently, they want to use this in the cross of the
13 plaintiff, and I object to the use of this document.

14 THE COURT: Can I see it?

15 MR. HARRIS: Yes, Your Honor. If I may?

16 THE COURT: Somebody.

17 MR. HARRIS: And it's -- the type is extremely
18 small, though. It's the calendar of Dr. Jie Wu in October
19 2011 and November of 2011. And I'm prepared to respond when
20 the Court would like.

21 THE COURT: Is this the Doctor's calendar?

22 MR. HARRIS: It is.

23 THE COURT: And what are you going to use it for?

24 MR. HARRIS: Well, I was going to use it through
25 the cross-examination of Ms. Briggs. Specifically, there has

1 been significant testimony regarding the 11/9 incident, in
2 which Ms. Briggs received a report. And certainly, there's
3 been testimony regarding -- or at least questioning regarding
4 whether or not Mr. Jie Wu -- or Dr. Jie Wu had made a
5 statement, an ageist statement, with respect to women in
6 China, somewhere around November of 2009. And the testimony
7 has been brought up whether or not he came -- recently came
8 back from a trip from China. The calendar doesn't suggest
9 that, so that's the purpose of using that calendar.

10 Ms. Briggs was his Executive Assistant, responsible
11 for his calendar and travel. So she can certainly verify the
12 authenticity of that document. And I just received it
13 yesterday, and counsel got it this morning.

14 THE COURT: Yes?

15 MS. MATTIACCI: Number one, she cannot authenticate
16 this document. This is Dr. Wu's calendar. I guess he could
17 have done it yesterday, but didn't.

18 Number two, it was not produced at all in the
19 course of this discovery, throughout this case, for the last
20 three years of litigation. We just get it. This is the
21 definition of "trial by ambush," on the morning of this
22 witness, after Dr. Wu testified. It was not identified in
23 any trial exhibit list. I can't even read --

24 THE COURT: Yeah.

25 MS. MATTIACCI: -- the words on here --

1 THE COURT: I can't, either.

2 MS. MATTIACCI: -- because it's so small.

3 MR. HARRIS: Judge, fortunately, we have a computer
4 technologist who will be able to put it on the screen, to
5 make it larger. That's the largest that I have it, as well.
6 I received it yesterday --

7 THE COURT: Well, did --

8 MR. HARRIS: -- so counsel received it this
9 morning.

10 THE COURT: Did Ms. Briggs -- is she responsible
11 for that, making up that calendar?

12 (Participants confer)

13 MS. BRIGGS: Yes, sir, I would add things to his
14 calendar. I would also -- he also put his own things on
15 there.

16 MS. MATTIACCI: She would add things to his
17 calendar, but she was not in charge of this calendar.

18 MR. HARRIS: Well, Judge, if she wasn't, then who
19 was?

20 (Participants confer)

21 MR. HARRIS: That's the whole point of cross-
22 examination.

23 THE COURT: Yeah. Objection sustained.

24 MS. MATTIACCI: Thank you, Your Honor.

25 MR. HARRIS: Judge, will I be permitted to use

1 that, if I bring Jie Wu back to testify in my case-in-chief?

2 MS. MATTIACCI: Your Honor, I'd object to that.

3 THE COURT: Why?

4 MS. MATTIACCI: It was never produced in discovery.
5 We never had an opportunity to question Dr. Wu about it. If
6 they have this page, I guess they have all these other pages
7 of this calendar, which we were deprived of. We asked for
8 any and all documents that were relevant to this case,
9 including information concerning scheduling. We weren't
10 provided any of this.

11 THE COURT: Yeah. Let's deal with this one. Okay?

12 MS. MATTIACCI: Yes.

13 THE COURT: All right. How are you harmed by this?

14 MS. MATTIACCI: Because I have no idea what he's
15 going to testify to, as to it.

16 THE COURT: All right.

17 MR. HARRIS: Judge, he's going to testify that, in
18 October of 2011, he didn't travel outside the United States,
19 other than when he went to Spain. If he went to Spain, he
20 certainly couldn't have been in China, which is what the
21 evidence was, and which counsel asked him on cross-
22 examination, as it relates specifically to the November 11th
23 -- or November 9th incident report, in which Ms. Briggs was
24 disciplined.

25 MS. MATTIACCI: That -- Your Honor, that was not

1 even the context of the conversation. There was -- it was
2 not a context of what -- he just came back from China, that
3 was never part of what happened. In fact, Dr. Wu testified
4 to the opposite, that they regularly had conversations about
5 his travels around the world and about the differences in the
6 cultures, between Asia and China [sic]. It wasn't linked to
7 any, I just came back from China statement. That was never
8 said, it was never part of this case, so --

9 MR. HARRIS: That's exactly what he testified to,
10 Your Honor.

11 THE COURT: Yeah, I don't recall it, frankly, but -
12 -

13 MS. MATTIACCI: Well, I do --

14 THE COURT: The question is, if you call him back?

15 MR. HARRIS: Yes, Your Honor. I can call him back
16 in my case-in-chief, and he can certainly talk about his
17 travel and when he made the comment, and when he didn't make
18 the comment.

19 THE COURT: So he would be testifying from his
20 recollection, as refreshed by this calendar?

21 MR. HARRIS: Exactly.

22 THE COURT: So you don't really need the calendar.

23 MR. HARRIS: Well, I don't have to use it for Ms.
24 Briggs, no. I would like to use it for Ms. Briggs because I
25 think it goes to impeachment, and I think that's -- it's an

1 important part of the case, as to whether or not she's
2 telling the truth about a statement that he denies making at
3 all.

4 She says -- Ms. Briggs is going to testify, as I
5 understand it, that she received a discipline in relationship
6 to her making a comment that this is the United States, this
7 isn't China, and related to Dr. Wu's statement. Dr. Wu
8 denies that. He says, the only time we had a conversation is
9 when I came back from China, and it was part of a larger
10 conversation. That's exactly what's before the jury.

11 And what this calendar demonstrates is that he was
12 not in China in October of 2011, he wasn't in China in
13 November of 2011. So there's no way that the conversation
14 that she alleged took place could have occurred close in time
15 to when the discipline was received. This is what Dr. Wu
16 said.

17 MS. MATTIACCI: Your Honor, that's contrary to the
18 testimony of yesterday. He said that they constantly talked
19 about cultural differences.

20 THE COURT: Yeah, I'm sustaining the objection to -
21 -

22 MS. MATTIACCI: Thank you, Your Honor.

23 THE COURT: -- the calendar.

24 Are we ready to go?

25 MS. MATTIACCI: Yes, Your Honor.

1 THE COURT: Mark, why don't you see if the jury is
2 there.

3 (Pause in proceedings)

4 THE COURT: Who is the next witness?

5 MR. MUNSHI: The Plaintiff Ruth Briggs will be our
6 next witness, Your Honor.

7 THE COURT: All right.

8 (Pause in proceedings)

9 THE COURT OFFICER: All rise.

10 (Jury present)

11 THE COURT: Okay. You may be seated.

12 The plaintiff may call the next witness.

13 MR. MUNSHI: Good morning, Your Honor. Our next
14 witness is the Plaintiff Ruth Briggs.

15 THE COURT: All right.

16 THE COURT OFFICER: You can come up.

17 THE WITNESS: Okay.

18 THE COURT OFFICER: Please raise your right hand,
19 place your left hand on the Bible.

20 RUTH BRIGGS, PLAINTIFF, SWORN.

21 THE COURT OFFICER: Please state your full name for
22 the record.

23 THE WITNESS: It's Ruth Virginia Briggs.

24 MR. MUNSHI: And Your Honor, before we get started,
25 can we just make sure that everybody can see the witness --

1 THE WITNESS: I --

2 MR. MUNSHI: -- the witness, in light of the
3 screen? Good? Okay. Thank you.

4 May I proceed, Your Honor?

5 THE COURT: Yes.

6 MR. MUNSHI: Okay.

7 DIRECT EXAMINATION

8 BY MR. MUNSHI:

9 Q Good morning, Ruth.

10 A Good morning.

11 Q Can you please introduce yourself to the jury?

12 A Hi. My name is Ruth Briggs. I'm 63 years old, and I'm
13 mother of four grown children, and grandmother to three.

14 Q Can you tell us, Ruth, where you live?

15 A I live in Philadelphia, the Kensington Section of
16 Philadelphia, in an apartment.

17 Q And how long have you been living there?

18 A I moved there November 1st of 2017, last year.

19 Q Just last year.

20 A Yeah. Yes.

21 Q And before you moved there, where were you living in
22 Philadelphia?

23 A I lived in an apartment, very -- very close to Campus,
24 in -- in the Temple area (indiscernible) anything else.

25 Q And do you live with anybody, Ruth?

1 A No, I do not.

2 Q You mentioned that you have children. How many children
3 do you have?

4 A I have four; my oldest is 34, and her name is Elizabeth.
5 Abigail is 32, Gabriel is 30, and Zachary is 27.

6 Q And Ruth, are you married?

7 A No, I'm not. I was -- got divorced in '97, 1997.

8 Q After the divorce, did you maintain custody of the four
9 children?

10 A Technically, we had shared custody, but my husband left,
11 took a job in South -- North Carolina about a year after he
12 left, so I had pretty much a hundred percent custody of the
13 children.

14 Q Now, Ruth, tell us -- walk us through your formal
15 education back.

16 A Okay. Well, I -- I start -- I came late to college. My
17 -- I started taking classes after -- after high school. And
18 then, after -- I got four -- well, I guess I started college
19 when I was 24, full time. So I had gotten enough to get past
20 the freshman year. I started full time when I was 25-ish --
21 20 -- yeah 25, and I graduated -- I graduated seven months
22 pregnant. I was married. From a Women's Catholic college.
23 I graduated with honors.

24 Q And what was your degree in?

25 A My degree was in pre-law, political science, and

1 history.

2 Q And after you graduated from college did you take any
3 further formal education?

4 A Well, when I -- I'm from Baltimore. And so, when we
5 moved here, I -- I was at home with the children. But I did
6 enroll in a graduate program at Chestnut Hill College, in
7 counseling and psychology. I did have to withdraw. I
8 withdrew on -- because of my husband leaving, so it was a
9 family reason. So I withdrew from the program before
10 graduation. I believe I was about 12 -- 12 credits short of
11 my -- my degree.

12 Q And did your parents or siblings go to college, as well?

13 A I was the first in my -- first and only one in my family
14 to go to college and graduate.

15 Q Tell us about the work that you did while you were
16 raising your kids.

17 A I -- I -- my interest has always been in -- in social
18 justice and -- and working with people who are less fortunate
19 than I am. So I -- when I came up here, there was a job that
20 a friend of mine told me about had opened up at the
21 Osteopathic Hospital. And it was working -- it was a Pew
22 Charitable Trust grant that was working with -- with pregnant
23 teens, called "A Better Start."

24 And the goal was to have -- get -- we had them when they
25 were pregnant, and then was to prevent a pregnancy before

1 they were 20. That's what the research component was. So I
2 worked with them at Health Center Five at -- in Philadelphia.
3 Work with -- that's while I was still at Osteopathic, and
4 worked with a group of midwives who were on -- who had
5 privileges there.

6 Q And did you continue to do that work --

7 A I continued --

8 Q -- after Osteopathic?

9 A Yeah. The family -- this department -- actually, it's
10 no longer a hospital; it's just a medical school. So, when
11 they got rid of the hospital, our -- our department was gone,
12 too. So I -- it's a very small community of women who work
13 with these kinds of populations, and people get to know each
14 other.

15 So I had learned about Family Planning Council, waiting
16 on getting a grant for working with incarcerated women who
17 were pregnant and/or parenting. The goal was to -- for
18 reunification. All of them had had their children removed
19 from their -- their -- their custody, and it was to -- to get
20 -- reunify them after they were incarcerated.

21 Q And you mentioned a grant right now.

22 A Yeah.

23 Q Describe the work you did with grants during this time?

24 A Well, I -- the grant that I came in on, I wasn't part of
25 that. But in order -- that -- it was over in a year. So we

1 were required -- I found -- I worked in the Department of
2 Special Projects. We were required to raise our own funds.
3 So we -- after, you know, the grants ran out, we would have
4 to go out and try to find another funder. So, for the --
5 that time, I went -- I funded my -- I -- it was a two-year
6 grant during that time. So two grants, I funded myself, my -
7 - my salary and the program.

8 When I left that job, I was working with University of
9 Maryland and A Father's Project, with a large grant, to
10 follow, not just mothers, but fathers. And they were going
11 to do the research comment. But I left pre -- before the
12 grant was up and running.

13 Q What was the next place that you worked after the Family
14 Planning Council?

15 A Well, like I said, it's a small community of women. So
16 the Executive Director of a place called Pennsylvania Home of
17 the Sparrow -- which was -- it's -- it was housing for women
18 leaving -- women with children, I should say, leaving prison.
19 And I -- once again, their role was reunification with their
20 children. So I -- that's the -- so, you know, she would see
21 me in the area, where we would meet with the mothers.

22 And I -- she asked me -- you know, we got to know each
23 other. And she -- we -- when she was looking for a
24 Development Director, she came over to me. She said, hey,
25 look, our Development Director left, would you mind -- you

1 know, would you think about coming over. And it was a pretty
2 significant increase in pay at that time, so I agreed to --
3 to do it.

4 Q And finally, tell us about the last job you had, before
5 joining Temple, and what you generally did there.

6 A I -- I was hired as the Assistant Director of Foundation
7 Relations at the Academy of Natural Sciences in Philadelphia.
8 And I worked with the biodiversity research staff, helping
9 them find funding for either research or curation of -- of --
10 of programs, or -- you know, that kind of thing, the --

11 Q Now, Ruth, before you had been terminated by Temple, had
12 you ever been terminated from a job before?

13 A Never.

14 Q Have -- before this action, have you ever filed a
15 lawsuit against a former employer?

16 A No, I have not.

17 Q Ever file any lawsuit?

18 A No.

19 Q So, Ruth, tell us. Why did you file this lawsuit?

20 A I filed this lawsuit because I was discriminated
21 against, based on my age and gender. And when I tried to
22 seek a remedy for it, I was retaliated against.

23 Q Ruth, let's talk about when you joined Temple.

24 Do you recall what year that was?

25 A In 2001.

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Q And tell us about the work you did at Temple, when you first started?

A I started there in -- it was a center, actually, in the College of Science and Technology, called the Center for Neurovirology and Cancer Virology. And I -- I worked with who -- the Director -- the Director of the -- of that center, Kamal Khalili, who was also the Editor-in-Chief for the Journal of Neurovirology, so I -- I worked with him only -- just specifically on the Journal and the -- it's a society-based journal, so with society membership. But I coordinated peer review of manuscripts as they came in, worked with authors, worked with guest editors, worked with the Editor-in-Chief.

Q And I think you mentioned earlier your age. But can you just tell us what year you were born in?

A In 1954.

Q So, when you first started working at Temple, in 2001 --

A I was --

Q -- how old were you?

A -- 43 -- if -- no.

Q I think it was 46.

A So 46. Okay.

Q (indiscernible)

A (indiscernible) okay.

1 Q How long did you hold that position as the --

2 A I was there --

3 Q -- Editorial Assistant?

4 A -- for a little -- almost a little over two years, I
5 think, when I was -- when I was -- found -- was hired for
6 this -- this job as Executive Assistant, within the same
7 college.

8 Q So just tell us what the next position was you had at
9 Temple --

10 A Okay.

11 Q -- after --

12 A Okay.

13 Q -- Editorial Assistant?

14 A I was hired as the Executive Assistant to the Dean of
15 the College of Science and Technology. That college is one
16 of the -- the newest colleges on Temple's campus, so it's
17 separated from the College of Liberal Arts, so we didn't have
18 a permanent dean. There were several acting deans. When I
19 came in, I was -- worked for Dr. Allen Nicholson, who was in
20 Biochem. He was -- had a faculty position in -- at Biochem,
21 and he was just the Interim Dean during that time, and it was
22 a very short time that I worked with him, I think probably
23 less than two months.

24 When it was announced that the Dean of Engineering would
25 come over as the Interim Dean, until the permanent dean was

1 found -- his name is Keya Sadeghipour. And I worked with him
2 until -- worked with him and -- and faculty committees to --
3 for the hiring -- I didn't hire -- I don't want to make it
4 sound that way. But I worked with them in -- to find -- with
5 the applicants for the permanent dean, and in bringing on
6 Dean Dighe (phonetic) from the University of Pennsylvania.
7 It was a real coup for us.

8 Q Tell us what your general job duties and
9 responsibilities were, while you were Executive Assistant to
10 the Dean.

11 A Well, it was -- as you can tell, when any leader comes
12 in, they have their -- you know, their goals and priorities.
13 And so it -- it would shift, you know, probably every other
14 year, or sometimes every year. And what -- for Allen
15 Nicholson, it was very short period of time, hardly really
16 got to know him, to be honest with you.

17 But with Keya Sadeghipour, we had a -- a good working
18 relationship. He was the Dean of the College of Engineering,
19 also. So, basically, he told me, Ruth, you are my eyes and
20 my ears, I can only be here half the time, don't let this
21 sink -- this ship sink on my watch. So that's what -- you
22 know, basically, he wanted me to do that. He wanted me to
23 deal with stuff that was going on administratively in the
24 office, but also keeping his calendar of committee meetings
25 for that college. So I didn't keep his college -- his

1 calendar for the College of Engineering, just for -- for the
2 College of Science and Technology, so he would know.

3 Q While you were Executive Assistant to the Dean, did you
4 have any responsibilities regarding event planning?

5 A Yes, I did.

6 Q Tell us about that.

7 A Specifically, under Keya Sadeghipour or -- or just
8 generally speaking? Okay.

9 Q At any point while --

10 A Yeah.

11 Q -- you were Executive Assistant.

12 A We have -- we have a lot of visitors come to the
13 University for -- you know, guests -- distinguished speakers,
14 CREs. So I would plan those.

15 In one -- early in -- in Dean Dighe's tenure there, my -
16 - my son was seriously injured, when a car hit him on his
17 bicycle. And Dean Dighe and Dr. Palladino (indiscernible)
18 and they came right to me. I had -- had worked late that
19 night because it was faculty -- the new faculty dinner.

20 MR. HARRIS: Your Honor, may we see you at sidebar?

21 THE WITNESS: I'm sorry.

22 THE COURT: Pardon?

23 MR. HARRIS: May we see you briefly at sidebar?

24 THE COURT: Yes.

25 (Sidebar)

1 THE COURT: Yeah. Come up here.

2 MR. HARRIS: Sorry.

3 THE COURT: This is the microphone.

4 MR. HARRIS: Yes.

5 THE COURT: So, if you want to get on, you have to
6 get near it. The objection?

7 MR. HARRIS: Yeah, I have an objection.

8 THE COURT: (indiscernible)

9 MR. HARRIS: I'm sorry, Judge. I have an
10 objection, just based on -- what counsel is asking is,
11 obviously, creating an emotional reaction --

12 THE COURT: Yeah.

13 MR. HARRIS: -- that I think inflames the jury.

14 THE COURT: Go on to something else.

15 MR. MUNSHI: Yes, Your Honor. All we intend to do
16 is have her describe the work that she did there, the amount
17 of time she put in there, and that's all I'm asking.

18 THE COURT: I know, I know. She veered off. But
19 then it's up to you to --

20 MR. MUNSHI: I'll bring her back.

21 THE COURT: -- bring her back. I didn't want to do
22 it.

23 MR. HARRIS: We'll bring her into (indiscernible)
24 when I objected, quite frankly.

25 MR. MUNSHI: Noted, I (indiscernible)

1 MR. HARRIS: (indiscernible) understand.

2

3 THE COURT: Right.

4 MR. MUNSHI: I'll bring her back.

5 (Sidebar concluded)

6 BY MR. MUNSHI:

7 Q Okay. Ruth, let's just go back to what you were
8 describing for us in terms of your job duties and
9 responsibilities while you were the executive assistant to
10 the Deans. And you told us about event planning.

11 Tell us about any responsibilities you had regarding
12 travel, organizing travel.

13 A Organize? I'm sorry?

14 Q Travel.

15 A Travel for --

16 Q Yeah. Were you responsible for organizing any travel
17 for the Deans?

18 A Yes.

19 Q Okay. And what did that entail?

20 A For all of them, all of them to order -- get an
21 itinerary for them. It wasn't until I think when I came in -
22 - over to the CIS Department that it became an all-online
23 system for Concur. And I was one -- I think I was one of the
24 first ones to try that, to test that program out. So that's
25 how I arranged travel through -- when I was at CIS,

1 Department of Computer Information Sciences.

2 Q And did that entail travel reimbursements as well?

3 A Travel reimbursements, itineraries, lodging, ground
4 travel.

5 Q How long in total did you hold that position of
6 executive assistant to the Dean?

7 A To the -- to -- four -- five years.

8 Q And during those five -- bless you.

9 During those five years, your supervisor, I think you
10 mentioned, changed from time to time.

11 Is that right?

12 A With each Dean. Yeah.

13 Q Okay. There was Dean Nicholson, Dean Sadeghipour, Dean
14 Dighe. Is that right?

15 A And Vice Dean Palladino.

16 Q And Vice Dean Palladino? Okay.

17 Over that course of five years when you reported to the
18 Dean, had you ever filed a complaint against Dean Nicholson,
19 Sadeghipour, Dighe or Palladino?

20 A No, I did not.

21 Q Had you ever gone to Human Resources or the EEO Office
22 regarding any of those supervisors of yours?

23 A No.

24 Q And just looking at that period from when you first
25 started at Temple in 2001 until you stopped being the

1 executive assistant to the Dean in 2009, just looking at that
2 period, during those eight-plus years, were you ever written
3 up for any performance-related issue?

4 A No, I was not.

5 Q During that period, did you ever receive any written
6 discipline of any sort?

7 A No, I did not.

8 Q During that period, did you ever get placed on a
9 performance improvement plan of any sort?

10 A Don't know what that is, but I -- so I guess I don't
11 know -- I guess I wasn't. So ...

12 Q Ever been suspended during that period?

13 A No.

14 Q Now, I think you have a binder in front of you. On the
15 front it should say --

16 A The black one?

17 Q I think they're both black.

18 It should say, "Plaintiff's Trial Exhibits," PL Trial
19 Exhibits.

20 A Okay.

21 Q Do you see that?

22 And if you can just quickly turn to the first document,
23 Plaintiff's Trial Exhibit 1 behind Tab 1.

24 A Okay.

25 Q And do you recognize this document, Ruth?

1 A I do.

2 Q And just tell us what this is.

3 A I do.

4 It's an HR -- Temple University's HR affirmative action
5 authorization that they use to report how many people applied
6 for the job that I got.

7 MR. MUNSHI: And, Your Honor, I believe Plaintiff's
8 Trial Exhibit 1 is already moved into evidence. May I
9 publish it to the jury, please?

10 MR. HARRIS: No objection, Your Honor.

11 THE COURT: Okay. You may.

12 BY MR. MUNSHI:

13 Q And if we can just go to the second page of Plaintiff's
14 Trial Exhibit 1, please.

15 A Uh-huh.

16 Q And, showing -- if you can just highlight -- blow up
17 that middle part, "Explanation," please? Thank you.

18 And, Ruth, can you just read out loud what Temple's form
19 says under, "Explanation of Selection" for the jury?

20 A Can I read it from here?

21 Q Sure. Whatever is easier for you.

22 A Okay. All right.

23 "The candidate was selected based on her
24 outstanding communication skills both verbal and
25 written, her previous work experience in developing

1 and writing grant applications, providing editorial
2 assistance, customer service. Prior university
3 experience and education made her the best-
4 qualified candidate."

5 Q Now, Ruth, during your tenure at Temple, did you
6 consider yourself to be a good employee?

7 A I did.

8 Q Why do you feel that way?

9 A That -- well, because that was the feedback I got. I --
10 I worked really hard. And when someone said, we need you to
11 take on an extra duty because so-and-so can't do it, I always
12 stepped up to the plate. I worked late. I worked when my
13 son was in the hospital, my support to bring -- to work with
14 a widow who -- a widow of a faculty member who was asked to
15 give a gift to the school. And what she wanted was for the -
16 - the college to do a memorial service for him. So while my
17 son was -- I was actually out on family medical leave. I
18 came back in and I planned the memorial -- memorial service,
19 which I learned later brought in a significant gift to the
20 college from his widow.

21 Q Did you ever make mistakes?

22 A Of course. Of course. I'm human. I'm -- and I'm --
23 I'm accountable. And when I do -- when I find them out, I'd
24 rather -- I'd rather point it out than someone find it out
25 about me. So I'm not saying that I always stepped up to the

1 plate first because I might not have been aware of something.
2 But when I knew that I made a mistake, I would go and say, I
3 dropped the ball, how can I make it right, what can I do to
4 make this right.

5 Q So let's continue down the time line of your tenure at
6 Temple.

7 After you were the executive assistant to the Dean, what
8 was the next position that you had?

9 A I went down to the -- to the same -- same type position,
10 but with Dr. Jie Wu as the Chair of the -- of the Computer
11 and Information Science Department.

12 Q Was that still within the same College of Science and
13 Technology?

14 A Yes, it was.

15 Q This was in 2009. Is that right?

16 A Yes, it was.

17 Q Okay.

18 A Yes.

19 Q Did your job duties and responsibilities change at all
20 from when you became the executive assistant to the Dean to
21 when you became the executive assistant to Dr. Wu?

22 A Specifically, there were things that were in the Dean's
23 office that would have been on a college -- on a college-wide
24 level rather than a department level. But a lot of it had to
25 do with confidentiality, dealing with promotion and tenure,

1 dealing with faculty hiring.

2 So I would -- at the Dean's office, I would have done,
3 you know, the next step of that. But when I went down to the
4 College of -- I mean, the Department, I dealt with it on a --
5 you know, on a departmental level.

6 Q With regard to Dr. Wu, did you have any responsibilities
7 or duties regarding travel?

8 A I arranged his travel. I submitted his reimbursements
9 and -- yes.

10 Q Any responsibilities regarding grants?

11 A I -- well, Dr. Wu had several research grants. And when
12 he would go on -- say he'd go on a -- to a conference or to a
13 meeting or just go be a visitor to maybe one of his co-PIs,
14 principal investigators, I would submit his travel expenses.
15 And as I said before, I was one of the first to do Concur
16 when it came into the college. So I was -- we kind of
17 muddled through it. But I was very familiar with the system
18 as being one of the first. I actually liked the system very
19 much.

20 But what I would do is I would enter his expenses into
21 the system. And then once all of them -- all of their
22 submission -- they were submitted, I'd have to allocate it to
23 a grant number or focal number, as they call it. And so --
24 but I didn't have access to all of Dr. Wu's grants if they
25 weren't being used, but just the ones that he was -- we were

1 using for expense -- expense-related things.

2 Q And just so we're clear, when you refer to Concur,
3 that's the system, the --

4 A Concur is -- yeah. It's part -- it's in -- exactly.
5 Yeah.

6 Q Now, did you, Ruth, work directly under Dr. Wu for the
7 rest of your period at Temple from 2009 until the end?

8 A Yes, I did.

9 Q Okay. So that was about five years?

10 A Yes.

11 Q Okay. Ruth, tell us about how Dr. Wu treated you in the
12 workplace.

13 A Dr. Wu could be -- you know, it was -- it was a -- I
14 kept wanting -- trying to make it work because he -- when he
15 said he thought I was his friend, he was very generous and --
16 and kind to me at times. And then the next day, I didn't
17 know if I was going to be yelled at, if I was going to be
18 embarrassed in front of my peers. It was that crazy that I
19 would walk in one day and go, oh, am I going to be hit or
20 hugged. And I don't mean that literally. I mean that, you
21 know, in a figurative sense. I didn't know whether I was
22 going get, you know, called into the office. I was walking
23 on eggshells a lot.

24 Q Did you have any fear?

25 A I had a lot of fear. I had a lot of fear. I -- I

1 sensed that after these writeups started coming that, as a
2 non -- I was a salaried employee, which meant I wasn't a -- I
3 wasn't in a union. And in Temple, just about everyone,
4 they're in a union, including faculty. So I was one of the
5 few who weren't. And in my department, I believe I was the
6 only non-union employee.

7 And I -- so I was expected to pick up where the hourly
8 rate people were not. So if they left, then I could pick it
9 up. So I -- I did -- I picked up a lot of extra tasks,
10 projects when I was -- I always volunteered for them. And I
11 kept trying to make it work. I kept -- I was trying to make
12 it -- make my -- make myself -- I knew that the -- that the
13 department needed me because when I wasn't there, they would
14 call me to say, Ruth, help me with this, help me with that.
15 But I -- it just didn't seem to -- Dr. Wu loved me when he
16 did, and he -- when he was not on my side, he was brutal. He
17 was brutal to me.

18 Q Did he ever raise his voice?

19 A He did raise his voice frequently. And quite -- in the
20 beginning when I started there, I did approach him privately
21 and ask him if he would -- if I could keep his door closed
22 while he met with his -- his Ph.D. candidates because it was
23 so disturbing to me to hear him yelling at them. So I -- he
24 did. We were allowed to do that. But I could still hear it.

25 There were times when he would come out and yell at me

1 in the front office. I -- on two separate occasions, I
2 remember him looking at me and saying, what are you, stupid.
3 And then another time when he said, can't you speak English.
4 And I was -- you know, I just don't know how to respond to
5 those kinds of comments. I just --

6 Q How does that make you feel to be yelled at?

7 A I was -- I was mortified. I was so embarrassed because
8 it would be in front of -- you know, it was a -- it was a
9 front office. So there could be students there. There could
10 be outside constituents visiting. There could be alums.
11 There could be parents. And there could be, you know, staff
12 members and faculty. So it wasn't like ever a private place.
13 It was -- it was always a public humiliation.

14 Q Did you ever hear him raise his voice with any other
15 employee?

16 A I never heard him. No, I did not.

17 MR. MUNSHI: Your Honor, before we go further, can
18 I just put up the organizational chart that's right up there
19 so the jury can see it?

20 THE COURT: Yep.

21 MR. MUNSHI: Thank you.

22 BY MR. MUNSHI:

23 Q Okay, Ruth. So let me now take you to 2011.

24 A Uh-huh.

25 Q Okay? And let's talk about November of 2011.

1 First of all, you mentioned the year that you were born.

2 But tell us the date of your birthday.

3 A November 10th, 1954.

4 Q Okay. Tell us what happened in November of 2011 on
5 November 9th.

6 A I was in the front office. I was at -- at my desk. And
7 Dr. Wu came and stood in front of my doorway. And he said,
8 so you're having a birthday, how old are you going to be.
9 And I didn't even know he knew my birthday. But I just
10 assumed that someone must have passed him a birthday card or
11 something. And I told him I was going to be 57. And he
12 said, well, you -- because, you know, in China, we put women
13 out to pasture at 55. And I -- like, my jaw dropped because
14 I knew the office was filled with people. And -- and I
15 replied to him, Dr. Wu, with all -- with all due respect,
16 we're in America and not in China.

17 Q How did that make you feel when Dr. Wu said words to the
18 effect of women are put out to pasture?

19 A Well, I was embarrassed. I was also insulted because I
20 -- I would still be working. I have no plan -- had no plans
21 to retire. I was going to work until I -- I like working. I
22 like being part of -- of a community. I like doing the work.
23 I like meeting people. And I love Temple. I -- I just can't
24 imagine that I would -- if I could still be there, I would
25 be. Not in that department, but I would be at Temple.

1 Q And after you responded to Dr. Wu with the comment about
2 being in America, not in China, what happened next?

3 A He walked away. And later, I would say within, you
4 know, an hour or so, I was called to the Dean's office and --
5 and given a disciplinary action for unprofessional conduct.

6 Q Who did you meet with?

7 A I met with Greg Wacker.

8 Q Okay. And on the organizational chart to your left,
9 Greg Wacker, can you just read his title for us?

10 A Director of Finance and Administration.

11 Q Okay. And he worked within the Dean's office?

12 A Yes, he did.

13 Q Okay. Tell us about the meeting that you had with Greg
14 Wacker that day.

15 A Well, he told me that Dr. Wu said that I'd been
16 unprofessional to him in the office and that I was getting a
17 writeup. And I was like, well, you know, what did he tell
18 you I did. And he didn't say anything. And I said, well,
19 did he tell you that -- what he said to me. And he said, no,
20 it doesn't really matter.

21 So there was no -- and I asked for an explanation on the
22 -- on the -- on my disciplinary action. There was just all -
23 - just about all of them just have a level and a -- and a
24 generic title. So I had to keep -- you know, I had to write
25 -- write down what happened. So, you know, I was like, why

1 don't I have an explanation of what this is. And I did at
2 one point ask Deirdre about that and she said that I was at
3 an at-will employee and she didn't owe that to me at all.

4 Q If you could turn to the document behind Tab 3 in that
5 same binder? This is Plaintiff's Trial Exhibit 3.

6 A Yes. I see it.

7 Q And do you recognize that document?

8 A Yes, I do.

9 MR. MUNSHI: And, Your Honor, Plaintiff's Trial
10 Exhibit 3 I believe has already been moved into evidence.
11 Could we publish that to the jury?

12 MR. HARRIS: No objection.

13 THE COURT: Yes.

14 MR. MUNSHI: And if you could just make it a little
15 bit bigger. Yeah.

16 BY MR. MUNSHI:

17 Q Okay. Ruth, is -- do you recognize this document as the
18 disciplinary report?

19 A I do. Yes, it is.

20 Q And just tell us what the date is in the upper right-
21 hand corner.

22 A It's 11/9/2011.

23 Q Okay. And is that the day before your birthday?

24 A Yes, it is.

25 Q Okay. When you met with Greg Wacker, did you tell him

1 what Dr. Wu said to you?

2 A Yes, I did.

3 Q Tell us what you told Greg Wacker.

4 A I was surprised that I was being written up for
5 unprofessional conduct. And I said, did he tell you what he
6 said to me. And I told him.

7 Q What did you tell him?

8 A I said that he told me in the front office that in
9 China, women are put out to pasture at 55. And I was turning
10 57. So I -- I felt -- I felt -- I was afraid, actually. To
11 be honest with you, I was afraid.

12 Q Did you tell Mr. Wacker how you responded to Dr. Wu in
13 that moment?

14 A Yes, I did. And he said that Dr. -- Dr. Wu said I had
15 treated him unprofessionally and that that's -- I was getting
16 it.

17 Q And at this point, Ruth, in November of 2011, you had
18 been working at Temple for over 10 years. Is that right?

19 A Yes.

20 Q Had you ever received any sort of written discipline
21 prior to this moment?

22 A No.

23 Q Did you tell anybody else at Temple about what Dr. Wu
24 said to you?

25 A I -- I told Rhonda Brown who is -- actually, I think she

1 is the Vice President of the Diversity -- Diversity
2 Department. And -- because I was working on an outside
3 project with her. And I told her about it. And she told me
4 just that I should see Sandy Foehl. And --

5 Q Now, after you had responded to Dr. Wu, as you just told
6 us, did your relationship with him change at all? Did his
7 treatment of you change?

8 A It did.

9 Q In what way?

10 A I was told, you know, not -- that I challenged him and -
11 - and I -- indeed, I did challenge him on this, and I felt
12 within my rights to do so.

13 Q Ruth, if you can please turn to the document that's
14 behind Tab 5 in that same binder. This is Plaintiff's Trial
15 Exhibit 5.

16 A Yes. I have it.

17 Q And this is a two-page document email chain. Can you
18 just look at it and let me know if you recognize this email
19 chain?

20 A Yes, I do. Uh-huh.

21 MR. MUNSHI: And if it's not already in, we'd like
22 to move Plaintiff's Trial Exhibit 5 into evidence.

23 MR. HARRIS: No objection, Your Honor.

24 MR. MUNSHI: And if we can please publish it to the
25 jury?

1 (P-5 received in evidence)

2 BY MR. MUNSHI:

3 Q Ruth, I'm going to turn you to the second page --

4 A Okay.

5 Q -- of Plaintiff's Trial Exhibit 5.

6 A Yes.

7 Q And I'm going to ask you to look at the email that
8 starts this chain on the bottom of the second page.

9 MR. MUNSHI: If we can just blow up that second --
10 that bottom email?

11 THE WITNESS: Okay.

12 BY MR. MUNSHI:

13 Q Okay.

14 A "Dear --"

15 Q Hold on. Sorry.

16 Can you just tell us the date of this email, please?

17 A This is July 26 -- 25th, 2012.

18 Q And who did you send this email to?

19 A To Sandra Foehl.

20 Q And we can refer back to the organizational chart next
21 to you. Who is Sandra Foehl.

22 A She is in the Equal Employment Opportunity Office in --
23 on Temple's campus, not outside. She was inside.

24 Q Okay. Read for us the email that you sent to Sandra
25 Foehl on July 25th, 2012, please.

1 A "Dear Sandy, I spoke to Rhonda Brown regarding my
2 personal employment issues about which I was
3 encouraged to meet with you. Please let me know if
4 you have availability to meet with me during the
5 two weeks that begin next Monday, July 30th."

6 Q And you reference Rhonda Brown here. And we can look at
7 the organizational chart.

8 Do you see her title as well? What was that?

9 A Yes. She's Officer of Diversity, office -- she was Vice
10 President for the Office of Diversity.

11 Q Right. Ruth, a few months passed between the discipline
12 and this email. Can you tell us why you didn't reach out
13 right away?

14 A I was -- my son was having another surgery, a revision
15 surgery in August of 2012. And I was going out on family
16 medical leave for that. And I was afraid that going out on
17 family medical leave and -- and filing or submitting a formal
18 complaint, I was afraid of retaliation. So I told Jenny -- I
19 told her that. I said, I don't want to do this now when I'm
20 going out for my son on family medical leave. So I didn't --
21 I didn't file it.

22 I did tell her, though. I told her what happened.

23 Q Well, let's walk through that.

24 A Okay.

25 Q Did you meet with Sandy after you --

1 A Yes.

2 Q -- sent this email?

3 A Yes, I did.

4 Q Okay. Was this in person?

5 A Yes.

6 Q Okay. And tell us what you told Sandra Foehl, the
7 Director of Equal Employment Compliance, in your face-to-face
8 meeting with her.

9 A Well, I -- I told her about the age comment and I told
10 her about my -- the retaliation -- my fear of retaliation.
11 And I asked her if there was some kind of way that she could
12 mediate for Dr. Wu and I. I didn't understand what her role
13 was, if she was just there to file a formal complaint or not.
14 And since I agreed -- I said to her I was afraid to do it,
15 that I didn't know that she -- you know, I just didn't know
16 what her role was.

17 Q Had you ever gone to her with a complaint before?

18 A I -- not for me. I had met her for another thing. But,
19 no, I -- never for me.

20 Q And looking at this same email chain, Plaintiff's Trial
21 Exhibit 5 --

22 A Uh-huh.

23 Q -- can we go to the first page, please?

24 A Sure.

25 MR. MUNSHI: And if we can just blow up the top

1 email?

2 THE WITNESS: Yes. The one dated August 2nd, 2014?

3 BY MR. MUNSHI:

4 Q Yeah. August 2nd --

5 A '12, I mean.

6 Q August 2nd, 2012.

7 Do you recognize this as an email that you sent to
8 Sandra Foehl?

9 A Yes, it is.

10 Q And read for us your email that you sent to Sandy on
11 that day, please.

12 A "Dear Sandy, thank you for meeting with me on
13 Monday, July 30th to discuss several issues
14 regarding my employment with the University. If it
15 is possible to review the letter to Michael Klein
16 before sending, please let me know. If not, I
17 would appreciate a synopsis of the content
18 presented in the complaint so that I will be
19 prepared for my -- for my return to work after my
20 son's surgery. I'm not having buyer's remorse, but
21 I'm nervous about the manner with which I will be
22 treated when I return after my son's surgery. I
23 will be out of the office tomorrow, Friday,
24 September 3rd, but I will check my email. Thank
25 you so much for your help. I greatly appreciate

1 your guidance."

2 Q And just so we're oriented, Michael Klein is also on the
3 organizational chart. Who is that?

4 A He was the Dean -- then the Dean of the College of
5 Science and Technology.

6 Q Ruth, if you can now turn to the document that's behind
7 Tab 7 in that same binder, Plaintiff's Trial Exhibit 7,
8 please.

9 A Okay.

10 Q And this one-page document, do you recognize this email
11 chain?

12 A Yes, I do.

13 Q Okay. And the bottom email, is that from you to Sandy
14 Foehl?

15 A Yes, it is.

16 MR. MUNSHI: Your Honor, we'd like to move
17 Plaintiff's Trial Exhibit 7 into evidence.

18 MR. HARRIS: No objection.

19 THE COURT: It's admitted.

20 (P-7 received in evidence)

21 MR. MUNSHI: And may we publish it to the jury,
22 please? Thank you.

23 BY MR. MUNSHI:

24 Q Ruth, let's -- and this is now September 9th, 2012, so
25 about five or six weeks after you meet with Sandy Foehl,

1 correct?

2 A Approximately. Yeah.

3 Q And let's take a look at your email so Sandy Foehl on

4 September 9th, 2012, the bottom email, please.

5 A Sure.

6 MR. MUNSHI: And if we can just -- yeah, blow that
7 one up. Can we make it any bigger than that? Okay.

8 BY MR. MUNSHI:

9 Q Well, we'll take it section-by-section, Ruth, with
10 regard to the --

11 A Yes.

12 Q -- so the jury can see it.

13 But go ahead and tell us what you wrote to Sandy Foehl.
14 Read for us what you wrote for her.

15 A Okay. "Dear Sandy, I'm uncertain --"

16 Q Just go slowly, please. Yeah.

17 A I'm sorry?

18 Q Go slowly, okay?

19 A "I'm uncertain about the status of the complaint
20 about which we spoke regarding my job description,
21 my performance development plan and adjusting my
22 salary to the 2011 maximum salary new-hire range
23 for T26," which was my grade level at Temple. I
24 did receive a 1.75 salary increase and a one-time
25 one-thousand-dollar bonus. But I heard that other

1 non-bargaining staff members also received a small
2 salary increase. My earnings for 2011 -- my
3 earnings for 2011 was fifty-one thousand six
4 hundred and fifty-five" -- "fifty-one thousand.
5 With the increase, my salary would be 51,525, which
6 is \$2,075 less than the maximum salary permitted
7 for a new hire."

8 Q And let's go down to the next paragraph of your text. I
9 think we can highlight the paragraph starting with, "The
10 position."

11 And read for us the next three paragraphs that you wrote
12 to Sandy Foehl, starting with, "The position I held."

13 A Okay. Okay.

14 "The position I held, I came" -- "the position I
15 held before I came to Temple was Assistant Director
16 of Foundation Relations at the Academy of Natural
17 Sciences. This position I held" -- "this position
18 I held before that was the Director of Development
19 in PA" -- "Pennsylvania Home of the Sparrow the
20 Prison Society. I have a BA in history and
21 political science, and I'm 12 credits short of my
22 master's in counseling psych."

23 Is that it?

24 Q Keep going. Yep.

25 A Okay.

1 "Dr. Wu knows that I have years of experience in
2 grant writing, scientific publishing, event
3 planning, but he's giving me this functions" --
4 "giving these functions to one of our student
5 workers as well as a private" --

6 She got a private office, is what I'm saying.

7 "My primary functions are those of our department
8 secretary Judy Lennon. The department secretary is
9 limited to tasks so" -- "tasks that can be
10 completed on a typewriter and a copy machine
11 because she has" -- "because she was allowed to
12 perform her job using decade-old office technology.
13 Her computer literacy is extremely limited because
14 there was no one in the department leadership
15 directly mentoring her through her PDP to attend
16 computer training classes offered at the
17 University. Before I moved to CIS, this problem
18 was identified by Greg Wacker in the CST Dean's
19 Office. I was told not to help her with any of her
20 work so that her lack of skills could be documented
21 as poor job performance. In fact, Greg threatened
22 me with disciplinary report for insubordination if
23 he found me helping her on the computer. He told
24 me he would" -- "he told me to refuse to help her
25 and I" -- "I" -- "and send her to the Dean's office

1 so that she could" -- "so that he could have just
2 reason to let her go. "I told him that I would not
3 throw the, quote, 'widow with cancer' under the
4 bus, and I have -- because I have no supervisory
5 role over her. This is a goal -- if this goal was
6 his to document her inefficiency in order to fire
7 her, he would also have to catch me helping her
8 because I believe in -- her inefficiency is a
9 symptom of poor leadership."

10 Q And let's go to the next three paragraphs. And, Ruth,
11 if it's easier to read on the screen --

12 A I think it is.

13 Q -- I think it's a little bit -- go ahead and do that.

14 A Yeah.

15 Q But just make sure you're reading into the microphone,
16 okay?

17 A Okay. All right.

18 Q Yeah.

19 A "The reason --" can you hear me?

20 "The reason for reporting this to you is unrelated
21 to Judy's performance, but relevant to bullying
22 tactics from a man who has threatened me with
23 dismissal for lack of loyalty to him. As a single
24 mother of four children, he knew that I was afraid
25 that he would" -- "afraid that he was in a position

1 to fire me. I" -- "I do know that I was paid
2 significantly lower than my two" -- "two male staff
3 members in the Dean's office who were my equals."

4 Keep going?

5 Q Keep going.

6 A Okay.

7 "Regarding our discussion related to Dr. Wu's
8 comments about my age, I am forwarding an email
9 that was sent to a student worker in our office
10 about" -- "about yet another job" -- "another one"
11 -- "job functions assigned to her. I was copied on
12 the email as to" -- "as you can see in the email
13 header, as was" -- "as was last week. I was
14 informed in front of Mary Kate, who is a student
15 worker, that she would be handling all his travel
16 arrangements, too. I am not authorizing any action
17 on my part because I am waiting to be cleared for
18 FMLA for a short period to care for my son who has
19 a spinal-cord injury."

20 Q And let's just go to the top email on that same email
21 chain. It's an email up top to Rhonda Brown.

22 A Okay.

23 Q And Rhonda Brown of Office of Institutional Diversity.
24 Read that email for us, please.

25 A "Dear Rhonda, I regret having seen Sandy Foehl

1 because I could not see the original complaint, nor
2 have I heard if it was filed, nor how it will be
3 addressed. I am over my head now taking care of an
4 invalid twenty-four-year-old and don't want to have
5 the threat of joblessness in the face of this
6 crisis. Sorry that I do not have time to write
7 more about the complaints that I wish to be
8 researched. My son needs me now."

9 I was out then.

10 Q And just with regard to the workplace at this time in
11 2012, describe for us what was happening that led to you
12 reaching out to Rhonda Brown and Sandy Foehl.

13 A I was -- I was fearful of retaliation. I had -- I had
14 talked to Sandy. I had talked to Greg. I talked to Rhonda.
15 And I believe I probably talked to Deirdre Walton, although I
16 -- around this time, too. And no one was helping me. And I
17 did fear that when I returned, I would be let go.

18 Q And how -- with regard to Dr. Wu, how was his treatment
19 of you during this period?

20 A During this -- this period here? It was harsh, to be --
21 to be honest with you. He was harsh with me. He -- he made
22 me -- he made me come into work, even though I had been
23 approved for FMLA, the Friday after my son's surgery. And I
24 -- I did come in. But I -- because I was -- I felt
25 threatened.

1 But I -- you know, the reason why is he said we were
2 short-staffed. And I had put in my notice two months -- we
3 knew his surgery was being scheduled. So I had put in this
4 for FMLA long before anyone else. But this happens to be in
5 -- you know, August/September, a lot of people were out for
6 vacation. And he made me come in.

7 Q Let's go to Tab 10 in the binder that's in front of you
8 here. It's Plaintiff's Trial Exhibit 10.

9 A Okay.

10 Q And this is another email chain. And just tell us if
11 you recognize this document --

12 A I do.

13 Q -- as emails? Okay.

14 A I do.

15 MR. MUNSHI: We move for admission of Plaintiff's
16 Trial Exhibit 10.

17 MR. HARRIS: No objection, Your Honor.

18 THE COURT: It's admitted.

19 (P-10 received in evidence)

20 MR. MUNSHI: And may we publish it to the jury?

21 THE COURT: Any time it's admitted.

22 MR. MUNSHI: Any time? Just go for it? Thank you.

23 And then, Charlene, if you could just blow up the
24 entire content. Yeah. Thank you.

25 BY MR. MUNSHI:

1 Q Ruth, let's go to the bottom email in this chain.

2 A Uh-huh.

3 Q And tell us the date of that email.

4 A It's February 7th, 2013.

5 Q Okay. And tell us who this -- your email is to.

6 A It's to Rhonda Brown, the Vice President of the
7 Diversity Office.

8 Q And read for us what you wrote to Rhonda Brown on
9 February 7, 2013, please.

10 A "I am so bullied and harassed all day. Two people
11 in the Dean's office tell me that I can find
12 another job. That can't be right. Ruth."
13 Sorry.

14 Q Okay. And read for us Rhonda Brown's response.

15 A She replied, "Go to Sandy."

16 Q Did you understand that to be the same Sandy Foehl who
17 we've been talking about?

18 A Yes.

19 Q And time-line-wise, this February of 2013. You had
20 already met with Sandy at that point. Is that right?

21 A That -- the August before I think it was, 2012.

22 Q Let's turn to the next email in that binder, Plaintiff's
23 Trial Exhibit 11. And tell us if you recognize this email
24 chain.

25 A I do.

1 MR. MUNSHI: And we'll move Plaintiff's Trial
2 Exhibit 11 into evidence.

3 MR. HARRIS: No objection.

4 THE COURT: It's admitted.

5 (P-11 received in evidence)

6 BY MR. MUNSHI:

7 Q And, Ruth, if we can take a look at your email of
8 February 8th, 2013 to Sandy Foehl on the bottom.

9 A Uh-huh.

10 Q And if we can blow that one up for the jury?
11 Read for us your email to Sandy Foehl of February 8,
12 2013, please.

13 A Okay. "Sandy" --

14 Q And if you want to read it on the screen if that's
15 easier, that's fine.

16 A "Sandy, I am so bullied and harassed every day all
17 day. Every morning I must meet with my direct
18 supervisor and Greg Wacker's assistant Drew DiMeo
19 for a staff meeting to discuss my failure to comply
20 with the directive that prohibits any work activity
21 that has not been approved by my supervisor, all of
22 which are related to performing daily functions in
23 the office, such as answering" -- "such as
24 answering questions from students or visitors to
25 our building. The threat of discipline for

1 assisting a visitor and responding to a request
2 from another office does not seem to have any
3 actions of wrongdoing; rather, fulfilling the
4 customer service expectation of the University. No
5 other staff member is required to meet daily for" -
6 - "for a closed" -- "again, it's a public
7 humiliation. And my request to move the meetings
8 to a private location was flat-out denied. When I
9 asked for clarification on an assignment, I" -- "it
10 was reported to the Dean's office that I was
11 challenging his authority. If he can have someone
12 there to protect his interests, there is no more
13 that I can" -- "there is more than an element of
14 bias. It is beginning to feel like psychological
15 abuse. If my only resource to address this problem
16 is through HR, this is unacceptable. Can I" -- "I
17 can't" --

18 Keep going?

19 Q Yeah. It's --

20 A "Can I contact --"

21 Q -- "Can I contact --"

22 A "-- a mediator?"

23 Q Now, going to the first page of Plaintiff's Trial

24 Exhibit 11, read for us Sandy Foehl's response to the email
25 that you just read out loud to us.

1 A Okay.

2 "Ruth, this is an issue for Human Resources first.
3 Address this situation and your concerns to Deirdre
4 Walton in Labor and Employee Relations. Sandy."

5 Q Ruth, tell us how it made you feel to receive this
6 response from Sandy Foehl after you had reached out to her.

7 A I was -- felt defeated. I kept -- I felt like I was
8 going about this the right way. I didn't -- I wasn't rude or
9 -- I just wanted someone to help me. And if -- all Sandy --
10 Sandy did respond to me, but often I didn't hear from other
11 people about it.

12 Q Let's go to the next document, please, in your binder,
13 Plaintiff's Trial Exhibit 12.

14 A Okay.

15 Q Do you recognize this email chain?

16 A I do. Yes.

17 Q Okay.

18 MR. MUNSHI: And we move for Plaintiff's Trial
19 Exhibit 12 into evidence.

20 MR. HARRIS: No objection.

21 THE COURT: It's admitted.

22 (P-12 received in evidence)

23 MR. MUNSHI: And if we can publish Plaintiff's
24 Trial Exhibit 12, please. And if we can focus on the bottom
25 email on that chain. And if you'd do the date as well,

1 please.

2 BY MR. MUNSHI:

3 Q And, Ruth, tell us the date of this email that you sent.

4 A It is February 9th, 2013.

5 Q And tell us who you sent this email to.

6 A To Cameron -- and I'm going to botch pronouncing his
7 last name -- Etezady.

8 Q Okay. We'll call him Cameron.

9 A Okay. Fine.

10 Q Who is Cameron?

11 A Cameron was -- I believe his title was Head Counsel in
12 Temple University's legal office.

13 Q Did you understand him to be a lawyer?

14 A He was -- yeah. I did know he was a lawyer.

15 Q Okay. Now, this is February 9th, 2013, the day after
16 the email we just looked at.

17 Tell us why you reached out to Cameron in the legal
18 office.

19 A Because I was concerned about retaliation.

20 Q Read for us what you wrote to Cameron.

21 A "I am contacting you to request a confidential
22 conversation to discuss disparate treatment for me
23 and I believe is related to my age of 58. I am
24 concerned about retaliation. If you are unable to
25 guarantee confidentiality, please say so in your

1 reply."

2 A And in Cameron's response to you on that same email
3 chain, what does he recommend that you do? Who does he
4 recommend you go to?

5 A He says that I should go see Sandy Foehl or her
6 assistant, Tracy Hamilton in the ERC office.

7 Q The same Sandy we've been talking about?

8 A Yes. Yes.

9 Q Okay. Let's go to the next document in your binder,
10 please, Plaintiff's Trial Exhibit 13.

11 A Uh-huh.

12 Q And same question. Do you recognize this email chain?

13 A I do.

14 Q Okay.

15 MR. MUNSHI: And if -- we'd like to move
16 Plaintiff's Trial Exhibit 13 into evidence.

17 MR. HARRIS: No objection.

18 THE COURT: It's admitted.

19 (P-13 received in evidence)

20 MR. MUNSHI: And if we may publish the first page
21 of Plaintiff's Trial Exhibit 13, please. And if we can just
22 enlarge the email. Oh, actually, can you take that off?
23 Take that off. Can you take it off the screen, please?

24 Yeah. Do you have the right one? We're good? Okay. Sorry.

25 BY MR. MUNSHI:

1 Q And, Ruth, and I want you to read the -- the email
2 that's on the screen here, not the one that's in front of
3 you. It's on your screen, too.

4 A Okay.

5 Q Can you tell us the date of your email to Cameron?

6 A Yes. February 10th, 2013.

7 Q Okay. So this is your response to the one that you just
8 read?

9 A Yes.

10 Q Okay. Read for us from the screen the content of your
11 email back to Cameron.

12 A "I appreciate your prompt response, and thank you
13 for taking your time to reply over the weekend.
14 After a week of unrelenting bullying, I sent an
15 email to Rhonda Brown and she told me to contact
16 Sandy. Sandy told me to contact Deirdre Walton."

17 Q Okay. And then read the rest of the screen, please.
18 Thank you.

19 A "On numerous occasions, Jie Wu has mentioned that
20 the professional lives of women my age, 58, in
21 China are over, and I wrote it off to cultural
22 differences. It was when he made a comment that
23 referenced my age and failure to attain the
24 financial stability to be able to travel when I
25 felt defensive and offended. I did not want to

1 make an issue about it, but I told him privately
2 that I was embarrassed when he insinuated that I
3 was a poor manager of money. In an attempt to
4 demonstrate that I was a dedicated mother, I told
5 him that the departure of my husband and the father
6 of my children was unexpected and unplanned for a
7 stay-at-home mother and I have given everything I
8 could to give my children" -- "to my children's
9 benefits" -- "benefit, rather than exposing myself
10 to the world" -- "to world travel. He also noticed
11 that my youngest child has another year at Temple
12 University and that I depend on tuition remission."

13 Keep going?

14 Q Yep.

15 A "I don't want to take any more of your time, nor do
16 I want to revisit the events from which I already"
17 -- "for which I am already distraught. I just want
18 to know where the buck stops. I am a Quaker. I
19 just" -- "and I just want someone to assist me to
20 mediate a person" -- "personnel problem to find a
21 mutually acceptable solution rather than another
22 adversarial relationship within the University."

23 Q Ruth, let's turn to the next document in your binder
24 behind Tab 14, please.

25 A Okay.

1 Q And this is Plaintiff's Trial Exhibit 14. If you can
2 just tell us if you recognize this email chain?

3 A I do.

4 Q Okay.

5 MR. MUNSHI: And we move for admission of
6 Plaintiff's Trial Exhibit 14.

7 MR. HARRIS: No objection.

8 THE COURT: It's admitted.

9 (P-14 received in evidence)

10 BY MR. MUNSHI:

11 Q And if we can just go to the second page of Plaintiff's
12 Trial Exhibit 14 and just focus in on the email that Cameron
13 sent you in response at the top of the second page. You
14 don't have to read it out loud for us. But just tell us who
15 Cameron refers you to.

16 A I'm sorry. What was the question?

17 Q Who does Cameron refer you to in his email back to you?

18 A Fay Trachtenberg.

19 Q Okay. And who is Fay Trachtenberg?

20 A She's also a lawyer in Temple's legal offices.

21 Q Okay. And if we can go to the first page of Plaintiff's
22 Trial Exhibit 14, and looking at your response to Cameron in
23 this email chain over a couple of days, read for us your
24 response to Cameron, please.

25 A "I will answer your" -- "I will answer your

1 questions. I am very uncomfortable with Deirdre
2 Walton. No, I'm not uncomfortable with Sandy, but
3 she referred me to Deirdre. I believe that Tracy
4 is in Sandy's office and Sandy referred me to HR.
5 I have no history of" -- "I have no history with
6 Fay Trachtenberg and would feel most comfortable
7 meeting with her" -- "I would feel comfortable
8 meeting with her to discuss this with someone who
9 has" -- "who is unfamiliar with the situation.
10 Should I contact her on my own?"

11 Q Do you recall, Ruth, then speaking with Fay Trachtenberg
12 at the legal office?

13 A Yes, I did.

14 Q And do you recall what she recommended -- did she tell
15 you to do anything?

16 A I recall that she told me to take it up with Deirdre
17 Walton in Labor Relations.

18 Q Okay. And during this period in 2012, 2013, 2014, did
19 you have communications with Deirdre Walton?

20 A Numerous.

21 Q Okay. Ruth, let's talk about another issue. Staying in
22 the time line, but just a couple of weeks later, okay?

23 A Okay.

24 Q Do you recall receiving another written discipline in
25 March of 2013 that was a three-day unpaid suspension?

1 A I do.

2 Q Okay. And was that the second written discipline that
3 you had received during your tenure at Temple at that point?

4 A Yes. It was.

5 Q All right. Tell us, Ruth, what happened that led to you
6 getting the three-day unpaid suspension at that time?

7 A It was -- I was working with one of the Assistant
8 Chairs, Eugene Kwatny, who headed up the hiring committee for
9 -- the faculty hiring committee for the department. And I
10 was -- I arranged for faculty candidates to come in, their --
11 you know, their itinerary, their lodging, their food and
12 their -- their -- I hosted them while they were here.

13 So Dr. Whaley was one of I believe nine or 10 that
14 semester. Dr. Whaley and I went back and forth. I sent him
15 an itinerary. He sent it back. It wouldn't work. So there
16 were like three or four itineraries. And I talked to Dr.
17 Kwatny about it and said, we're having a hard time nailing
18 this down. And he said, well, just tell him if he would feel
19 better, go ahead and buy his own ticket and we'll reimburse
20 him. He had to submit it for reimbursement. So that's -- so
21 what happened was I -- I took responsibility for not
22 following up on that. I was off campus at a conference with
23 Dr. Wu, and over the weekend, it occur -- you know, I checked
24 my email and Dr. Kwatny contacted me. He's like, did you get
25 an itinerary. And I think I -- you know, as I recall, I

1 responded like, do -- you know, it was more like a question
2 in my head. It was like, didn't we tell him that he could
3 purchase his own ticket. But it was like a question.

4 But when I went through -- you know, went through that
5 night, I went in the next morning and I went directly to Dr.
6 Wu and told him what happened, and I dropped the ball and how
7 could I make it right. And he said, well -- and then he
8 talked to Dr. Kwatny, and Dr. Kwatny -- I actually went to
9 Dr. Kwatny's office, too, and I apologized to him, took
10 responsibility for it, and I told Drew it -- Drew DiMeo, too.
11 And then I was given a three-day suspension without pay.

12 Q For this one error --

13 A Yes.

14 Q -- you received a three-day --

15 A Yes.

16 Q -- unpaid suspension?

17 A Yeah.

18 Q Now, Ruth, this is now February -- March of 2013 in the
19 sequence of all the events that we've seen.

20 How did it feel to get a three-day unpaid suspension at
21 that time for that error?

22 A I -- I was shocked. I was shocked. I just -- it seemed
23 -- it seemed harsh. But I -- I left -- I was given this
24 disciplinary warrant right off at the end of the day after
25 I'd worked all day and was told that I could not come back to

1 campus for three days and I would not be -- be paid for it.

2 So I -- I didn't come back for three days.

3 Q In the binder in front of you, you can turn to Tab 17,
4 please.

5 A Uh-huh.

6 Q And this is Plaintiff's Trial Exhibit 17. Can you just
7 tell us if you recognize this email?

8 A I do.

9 Q And who is this email from and to?

10 A To Deirdre Walton.

11 Q From you?

12 A From me. I'm sorry. Yes.

13 Q Okay.

14 MR. MUNSHI: And we move for Plaintiff's 17 into
15 evidence.

16 MR. HARRIS: No objection, Your Honor.

17 THE COURT: It's admitted.

18 (P-17 received in evidence)

19 MR. MUNSHI: And if we can put this up on the
20 screen, please?

21 BY MR. MUNSHI:

22 Q Now, Ruth, this email is to Deirdre Walton, and --

23 A Yes.

24 Q -- she's on our organizational chart as well.

25 Can you tell us what her role -- tell us what her role

1 was at Temple?

2 A I believe her title is Vice President of Labor Relations
3 in the HR Department.

4 Q Okay. And during this period, were you having email
5 communications with her?

6 A I had. Yes.

7 Q Were you also having phone conversations with her?

8 A Yes.

9 Q Okay. And during this period, did you have
10 communications with Ms. Walton about finding another job
11 within Temple?

12 A Yes.

13 Q Tell us about that.

14 A Well, Greg and -- Greg Wacker and Andrew DiMeo were
15 always saying if you don't like it, find another job. So I -
16 - I really wanted to stay at Temple. So I -- I bid on -- I
17 don't -- I can't say, but quite a few jobs for which I was
18 never considered. In fact, I could watch -- I could submit
19 an application and it would be returned within 15 minutes,
20 because you could see it online, as not considered.

21 Q What kind of jobs were you looking for internally at
22 Temple?

23 A Jobs that fit my, you know, my skill set, event
24 planning, development, maybe an executive assistant or two
25 over that time in other departments.

1 Q What do you mean by "other departments"?

2 A Well, outside of my college. Outside of the College of
3 Science and Technology.

4 Q Why did you want to leave the Department of Science and
5 Technology?

6 A Because I was being discriminated against there and --
7 and when I complained I was retaliated against.

8 Q If you can go to Tab 20, please, in that same binder?
9 Two zero.

10 A Okay.

11 Q And do you recognize this email?

12 A I do.

13 Q Okay. And this is to Deirdre Walton from you. Is that
14 right?

15 A Yes, it is.

16 Q Okay.

17 MR. MUNSHI: And we'll move Plaintiff's Trial
18 Exhibit 20 into evidence.

19 MR. HARRIS: No objection.

20 THE COURT: It's admitted.

21 (P-20 received in evidence)

22 MR. MUNSHI: And if we can put 20 up on the screen?

23 BY MR. MUNSHI:

24 Q Can you tell us the date of this email that you sent to
25 Ms. Walton?

1 A June 26, 2013.

2 Q Okay. And if we can read your email to Ms. Walton?
3 Again, if it's easier on the screen you can go ahead and do
4 that.

5 And tell us what you write to Ms. Walton at HR at that
6 time.

7 A "Dear Deirdre, I'm contacting you about a recent
8 job posting in the School of Media and
9 Communications about which I'd like your feedback.
10 I am confident that I have the skills and knowledge
11 to perform the essential functions of the job, but
12 intimidated and shaken by my Level C disciplinary
13 action on my employment record. As you know, I was
14 granted permission to review my employment record
15 so that I could see the manner with which the error
16 was reported to Human Resources."

17 That three-day suspension I'm talking about.

18 "In our meeting, I took responsibility for the
19 error and offered my opinion about the unfairness
20 of the punishment that was rendered against me
21 potentially without considering a list of
22 mitigating factors for my defense. No one person
23 or leadership in the department took into
24 consideration the poor oversight on the part of
25 management in regards to staffing issues."

1 Q Keep going.

2 A "I worry that a high-end manager will read the
3 letter out of context because I was not given the
4 opportunity to respond to Dr. Kwatny's complaint.
5 Additionally, I received reports from three faculty
6 members about Dr. Wu making untrue disparaging
7 remarks about me in the presence of faculty. Two
8 staff members and a student worker reported to me
9 that they overheard Dr. Wu talking about my
10 disciplinary action in a public setting when I was
11 suspended. How do I recover my reputation at this
12 point in my life? The disciplinary action is" --
13 "in isolation is enough to ruin me, but the" --
14 "but the unsubstantiated comments made in a public
15 setting that were reported to me from concerned
16 staff and faculty is beginning to feel like
17 character assassination. If I were valued for my
18 work ethic as a team player and my reputation with
19 external constituents, students and alumni, the
20 Dean's Office would intervene rather than suggest I
21 take outside employment opportunities. I could
22 hold tight for the remainder of my probation, but I
23 don't want to leave our community of students,
24 faculty and alumni for which I have great respect
25 and admiration, nor do I want to jeopardize my

1 son's senior year at Temple."

2 Q And just the last paragraph, then.

3 A "I would greatly appreciate it if you would give me
4 your straightforward and honest assessment about my
5 future prospects within the University. It has
6 become so difficult for me to be objective and I'm
7 certain that I" -- "my personal and professional
8 life is negatively affected as a result. I am not
9 asking for you to give me information about the
10 hiring manager for the position, but I would like
11 to know your opinion about" -- "about being damaged
12 goods."

13 And then it lists the job that I was looking at was the
14 assistant -- Assistant Program Director in I guess it was
15 (indiscernible) that would have been Communications and
16 Theater.

17 Q At Temple?

18 A At Temple.

19 Q Go to the next document, please, Tab 21.

20 A Okay.

21 Q The top email from you to Deirdre, do you recognize that
22 as your email?

23 A I do.

24 MR. MUNSHI: And we'd move Plaintiff's Trial
25 Exhibit 21 into evidence.

1 MR. HARRIS: No objection.

2 THE COURT: It's admitted.

3 (P-21 received in evidence)

4 MR. MUNSHI: And if we could put that on the
5 screen?

6 BY MR. MUNSHI:

7 Q Now, just read for us -- well, tell us, Ruth, what is
8 this email that you've sent to Deirdre on this day?

9 A Which -- which one? Is it -- oh, okay. Okay. All
10 right.

11 Q What do you recognize this email chain to be?

12 A It was to Deirdre, and it was my interest in -- in this
13 position.

14 Q And what was this position that you had emailed Deirdre
15 about?

16 A It was an event planner -- Associate Director for Events
17 Planning in Sullivan Hall, which is in the Development
18 Office, I guess, at Temple University.

19 Q And this position that you send Deirdre an email about,
20 read for us what the job qualifications are for that
21 position.

22 A Under, "Duties and Responsibility"?

23 Q Just read -- yeah. You see there that you sent her the
24 job qualifications?

25 A Yes.

1 Q Okay. And what I meant was read for us the email that
2 you sent to Deirdre where you attached the --

3 A Oh, okay. I'm sorry.

4 "The two positions about which I contacted you in
5 my email are no longer up on the website. I did
6 find this position today for which I'm qualified
7 and experienced. Your thoughts?"

8 And that was for the event-planning position.

9 Q Okay. Next -- next document in your binder, Plaintiff's
10 Trial Exhibit 22.

11 A Okay.

12 Q Can you tell us the date of this email chain?

13 A It is dated July 13th, 2013.

14 Q Okay. And the other two emails that we looked at were
15 also around this same period. Is that right?

16 A Yes.

17 Q Okay.

18 MR. MUNSHI: And can we move Plaintiff's Trial
19 Exhibit 22, please?

20 MR. HARRIS: No objection.

21 THE COURT: It's admitted.

22 (P-22 received in evidence)

23 MR. MUNSHI: And if we could just put up 22?

24 BY MR. MUNSHI:

25 Q And do you see on the bottom your email to Deirdre on

1 July 12th, 2013?

2 A Are we at Exhibit --

3 Q We're on 22.

4 A Yeah. I --

5 Q Yep. Is this you sending you another email to Deirdre
6 with an open position?

7 A Yeah. Yeah. She had to lift the hold on my ability to
8 hire. So I had to let her know so she could lift the hold.

9 Q About open positions?

10 A Right.

11 Q Okay. And then turn to 23 in your binder.

12 A Okay.

13 Q And do you recognize Plaintiff's 23?

14 A Yes.

15 MR. MUNSHI: And we move that into evidence.

16 MR. HARRIS: No objection.

17 THE COURT: It's admitted.

18 (P-23 received in evidence)

19 BY MR. MUNSHI:

20 Q And, Ruth, tell us about this email that you send to
21 Deirdre. What are you doing here?

22 A I just sent her this email that I wanted her to lift my,
23 you know, the hold on me to apply internally for positions.

24 Q And you write here, "Deirdre, this is another fit for
25 me"?

1 A Yes.

2 Q Okay. And, finally, let's go to Plaintiff's Trial
3 Exhibit 24 behind Tab 24.

4 MR. MUNSHI: And we move --

5 BY MR. MUNSHI:

6 Q Do you recognize 24?

7 A I do.

8 MR. MUNSHI: And we move Plaintiff's Trial Exhibit
9 24 into evidence.

10 MR. HARRIS: No objection.

11 THE COURT: It's admitted.

12 (P-24 received in evidence)

13 BY MR. MUNSHI:

14 Q And, Ruth, can you read us the email that you sent to
15 Deirdre Walton on August 4th, 2013?

16 A Sure.

17 "Deirdre, the last two positions about which I
18 emailed you may be located" -- "may be located in
19 unrelated departments. However, I have the skill
20 sets, experience and knowledge to perform the
21 essential functions. Thank you. Ruth."

22 Q Ruth, did Ms. Walton help you find another job within
23 Temple?

24 A No. No, she did not.

25 Q And this email, can you tell us the date of this email

1 to Ms. Walton?

2 A The one I just read?

3 Q Yeah.

4 A It's August 4th, 2013.

5 Q Okay. How were you feeling at that time with regard to
6 finding another job in your communications with Ms. Walton?

7 A Very -- very stressed. That year was really -- I was
8 trying desperately to, you know, make this work, have
9 somebody come and mediate with us, or get a job somewhere
10 else.

11 Q Let's go to Tab 27 in the binder in front of you.

12 MR. HARRIS: Excuse me, Your Honor. Before we go
13 to this exhibit, would this be an appropriate time for a
14 brief comfort break?

15 THE COURT: Okay. It's a little early. But ten-
16 minute recess.

17 MR. HARRIS: Yes, Your Honor.

18 THE COURT: All right. Jury may go to the retiring
19 room for 10 minutes.

20 (Recess taken at 10:44 a.m.)

21 (Proceedings resume at 10:55 a.m.)

22 (Jury not present)

23 (Witness resumes stand)

24 THE COURT: Have the jury come in.

25 THE COURT OFFICER: All rise.

1 (Jury present)

2 THE COURT: You may be seated.

3 MR. MUNSHI: May I proceed?

4 BY MR. MUNSHI:

5 Q Ruth, coming back after our break there, you were about
6 to look at the document behind Tab 27 in your binder,
7 Plaintiff's Trial Exhibit 27.

8 A I have it.

9 Q Okay. And the email on the -- the email chain, do you
10 recognize this email chain?

11 A I do.

12 Q Okay.

13 MR. MUNSHI: And we move for Plaintiff's 27 to be
14 admitted into evidence.

15 MR. HARRIS: No objection.

16 THE COURT: It's admitted.

17 (P-27 received in evidence)

18 BY MR. MUNSHI:

19 Q And, Ruth, on that first page of Plaintiff's Trial
20 Exhibit 27, the bottom half of that first page, the bottom
21 third, do you see an email from you to Cameron Etezady?

22 A Yes.

23 Q And remind us, Cameron Etezady is who?

24 A The -- a lawyer in Temple's legal office in -- in-house
25 legal office.

1 Q And had you previously communicated with him in 2013
2 about your workplace situation?

3 A Yes, I did.

4 Q Okay. And this bottom email, tell us the date of it.

5 A It is August 6, 2013.

6 Q Okay.

7 MR. MUNSHI: And if we can put that email chain up
8 on the screen, please?

9 BY MR. MUNSHI:

10 Q And starting with your email, Ruth, to Cameron on the
11 bottom of the first page --

12 A Yes.

13 Q -- August 6th, 2013. Read for us what you wrote to
14 Cameron on that date.

15 A "Dear Cameron, I am forwarding the email that I
16 sent in February of this year to refresh your
17 memory regarding my reason for reaching out to you
18 about my situation. I did contact Fay
19 Trachtenberg, as suggested, and she referred me to
20 Deirdre Walton. I did reach out to her and asked
21 her if she would be" -- "agree to meet with me and
22 doctor" -- "with Dr. Wu, Andrew DiMeo and me to
23 serve as a mediator-like role at one of our daily
24 morning meetings followed by a private meeting for
25 her to offer feedback and suggestions for leveling

1 the playing field to establish some sense of fair
2 play in the workday that commences in a" -- "in a
3 fifteen-to-thirty-minute competition between a team
4 of two men and me. I do not hear" -- "I did not
5 hear from her after our initial conversation until
6 I made contact with her in April when I returned
7 from a three-day suspension without pay. I do not
8 want to write a long email defending myself for a
9 mistake for which I pointed out to my supervisor,
10 to Andrew DiMeo, to Eugene Kwatny as soon as it was
11 discovered. I fully expected that I would receive
12 a verbal warning. You can imagine my surprise when
13 I received a Level C discipline for neglecting job
14 duties or responsibilities or failing to carry out
15 instructions given by a supervisor. I was asked to
16 sign a disciplinary action form, but was not
17 allowed to read the letter in which the allegations
18 against me were presented by the Department's
19 Associate Chair, Eugene Kwatny. I responded
20 respectfully, signed the form, and made a request
21 to Dr. Wu and Andrew DiMeo that the incident remain
22 confidential to my coworkers, students and student
23 workers for which they responded that the incident
24 would be handled professionally and privately. I
25 returned on Monday and learned from coworkers and

1 student workers that it was discussed in the front
2 office. One person heard about it on the elevator,
3 and another heard Dr. Wu talking about the
4 situation when she was waiting to pick up a form in
5 the Dean's office."

6 Q Keep going.

7 A "This was of great concern to me and I submitted a
8 request to review my employee file to read the
9 confidential letter that was" -- "I was not allowed
10 to read, which led to my harsh punishment. To my
11 chagrin, the allegations against me were
12 exaggerated and the state of the office at the time
13 were omitted. Rhonda Brown in HR was with me when
14 I reviewed this letter. I shared my hopelessness
15 with her and she encouraged me to call Deirdre
16 about the situation. I told her that I had asked
17 for help in February and her failure to respond did
18 not instill me with a sense of confidence in her.
19 But I did decide to reach out again. We did meet
20 the week I returned. All I was" -- "I was told
21 that while there was nothing" -- "I had no recourse
22 to have the harsh disciplinary action overturned
23 for a higher" -- "for lighter sentence, she would
24 allow me to bid on jobs internally. I was told to
25 send an email to her if I was interested in a

1 position and she would contact the HR generalist to
2 lift the hold. Since April, I've sent three
3 requests to my" -- "by email to bid on positions
4 that I found, but she has not responded. I have a
5 very strong personal belief regarding"
6 (indiscernible) "litigious society and I feel a
7 moral obligation to find solutions to a problem in
8 a manner that is not adversarial. But no one will
9 respond to me and my professional life is on the
10 line. My situation I believe now is compounded
11 because of my age, my gender, and perhaps
12 ethnicity. I'm begging for someone within Temple
13 to help me mediate this problem. My confidence has
14 never been so low and at 58 years old, I have" --
15 "I have no" -- "not options to change the course of
16 my plummeting professional career because I'm
17 relegated to making coffee and secretarial
18 functions, even though I've never been a secretary.
19 Young female students workers occupy the front
20 office areas where they carry out my job functions
21 while I was relocated to the third floor" --
22 actually, from the third floor of Walkman"
23 (phonetic) "to the tenth floor of Cornell. Even
24 though the two-verus-one meetings continue every
25 morning, the main office and I" -- "the main" --

1 "in the main office, and I still need to come down
2 when Dr. Wu has guests and wants coffee. I am so
3 far removed from the CIS department to appear as if
4 I was banished from the department where I am told"
5 -- "I am told by well-intentioned faculty who want
6 to remain anonymous, and students, that I am a
7 scapegoat for the department. If the" -- "I have
8 written far more than I intended and I will end
9 this message with an appeal to you to help me
10 navigate the dark to make" -- "to maintain the most
11 important thing to me, my integrity."

12 Q Ruth, if you can just turn to the first page of that
13 same --

14 A Which one?

15 Q The same -- same -- the Document 27.

16 A Okay.

17 Q And just read for us --

18 A The highlighted --

19 Q Are -- do you want to take -- do you need -- take a deep
20 breath. It's okay. It's okay.

21 A I'm okay. I'm fine.

22 Q Okay. On that first page, do you see the email that
23 Cameron sends back to you after you wrote that email to him?

24 A Yes.

25 Q And just tell us what does Cameron do at that time? Who

1 does he refer you to?

2 A To Fay.

3 Q Is this the same Fay that you referred to in your email?

4 A Fay Trachtenberg. Yes.

5 Q From counsel's office?

6 A Right. That's correct.

7 Q Okay. Ruth, let's go to Document 30 in your binder.

8 A Uh-huh.

9 Q Tell us if you recognize that document.

10 A Yes, I do.

11 MR. MUNSHI: And I believe this is already in
12 evidence, and we can show Plaintiff's Trial Exhibit 30.

13 MR. HARRIS: No objection.

14 MR. MUNSHI: Okay.

15 BY MR. MUNSHI:

16 Q Ruth, now we're a couple of months later. The email
17 chain that you just read for us was August of 2013. And now
18 we're going to be talking about 2014 and this disciplinary
19 report that you received a couple of months later.

20 Do you recognize this disciplinary report?

21 A Yes. Yes, I do.

22 Q Okay. And tell us the date of it, if you can see that?

23 A It is -- the date of action -- or the date -- January
24 20th, 2014.

25 Q And at this point, is this the third discipline that

1 you've had in 13 years at Temple?

2 A Yes.

3 Q Okay. So tell us, what happened here that resulted in
4 you getting this written warning?

5 A I had overslept three hours. And, you know, not -- I
6 was already scared anyways that they were after me, trying to
7 get rid of me. And I live very close to campus. We had no
8 written -- there was no -- the department didn't have any
9 procedures for doing this if you're late, call -- you know,
10 what were you supposed to do.

11 So I called the front office and a student worker
12 answered the phone. And I asked for Judy Lennon, who's the
13 department secretary. She said they -- they couldn't find
14 her. And I said, tell -- is Dr. Wu there. And she said, Dr.
15 Wu's in a meeting and the door is closed. So I said, tell
16 Dr. Wu that I am going to be there in five minutes. I lived
17 that close to campus.

18 And I went in and went to my office.

19 Q And did you call Dr. Wu yourself personally, on his cell
20 phone, for example?

21 A No. Because I was told he was in a meeting with the
22 doors closed.

23 Q Had you ever been this late, a couple of hours late
24 before?

25 A No.

1 MR. HARRIS: Objection. She said three hours, Your
2 Honor.

3 MR. MUNSHI: Oh, I'm sorry. Three --

4 BY MR. MUNSHI:

5 Q Have you ever been three hours late before at Temple in
6 13 years?

7 A No. In fact, I was -- generally there early, and I
8 worked late. I worked Saturdays. I worked Sundays. I was
9 not late. That is not a problem for me, and I was surprised
10 by the -- I was actually surprised to get written up, to be
11 honest with you. When it was handed to me, Dr. Andrew DiMeo
12 handed it to me and I was like, are you kidding. And he
13 went, Ruth, this is serious. I said, I'm not taking -- you
14 know, I'm not denying the fact that I was late, but this is -
15 - you're writing me up for this? I said, what am I -- I'm
16 trying to get off probation so I can, you know, get another
17 job. And he -- he was angry that he didn't think I took it
18 seriously. I did take it seriously. I felt horrible about
19 it. But I stayed on to work the rest of the day until well
20 into the evening, probably until 9 or 10. But that wasn't
21 unusual for any day for me.

22 Q Do you recall Dr. Wu testifying yesterday that you were
23 late multiple times a week? Is that true?

24 A Nothing could be further from the truth. I'm not saying
25 that I'd never been five minutes late when I commuted from

1 the suburbs because of, you know, transport -- you know --
2 you know, traffic, or I was late probably once that -- maybe
3 around that time, that snowy time we had because I was
4 walking to work. Five minutes. But three or four times a
5 week I believe he said. That is -- I feel that that's
6 another way to just make me -- assassinate my character with
7 -- there's no documentation, either.

8 Q That you received?

9 A And I -- from them, no. And I -- you know, I -- and you
10 can see that I document my -- you know, my things and, you
11 know, frequently.

12 Q And let's just get a better understanding of what your
13 workday was like.

14 Were you a -- an hourly worker who punched in or out, or
15 were you salary?

16 A No. I -- I was a salary employee at Temple. And I
17 believe I was the only administrative staff person in the
18 department who wasn't a union employee. So their work rules
19 said you come in at your time and you leave at your time. If
20 you punch in late or punch out late, you can be written up
21 for it. So they had to leave when they did, you know. And
22 when they did, often, I was still there. And whatever
23 someone needed -- was doing, Dr. Wu needed it, I stayed and
24 finished it up for them.

25 Q Did you ever work past 5 p.m.?

1 A It was frequently. A couple times a week I did.

2 Q How about on weekends? Ever work weekends?

3 A I did events, any event that came up I handled. I --
4 there were -- that -- actually, the day after I got written
5 up for this, Dr. Wu called me. It was a snow day and the
6 University was closed. And he told me that I had to come in.
7 And I'd just been disciplined. I wasn't going to argue with
8 him. I came in and I worked that day, even though the
9 University was closed.

10 Q Did you feel that this writeup was retaliatory?

11 A I did. It was -- it is. I believe in my heart that it
12 was retaliatory.

13 Q Were you aware of any other staff members who worked in
14 the office who were late or didn't show up for work?

15 A I am. And it's not my intention to rat anyone out.
16 That isn't my intention. My intention is to point out there
17 was a -- there was a different set of standards from me to
18 other people. We had a young woman start in our department,
19 Hailey King. And she had only been in -- maybe there for
20 like three months. And she didn't come in for three days
21 straight. Didn't call in. Didn't -- we didn't know what
22 happened to her. I was only made aware of it because the
23 timekeeper of the department was on another floor and she
24 called and she said, have you guys seen Hailey. And, no.
25 And she called every day. She called -- she kept trying to

1 call her, and she didn't -- nobody could get in touch with
2 her. She never called in. Then she showed up --

3 Q Is that the Hailey King that's on the organizational
4 chart over there with us?

5 A Yes. Yes, it is.

6 Q Around how old was Hailey when you worked --

7 A Like 28. I mean, yeah. I'm going to -- not older than
8 30, for sure.

9 Q Do you know if Hailey King received a written discipline
10 for not coming to work?

11 A I am not -- you know, I don't -- I don't want anybody to
12 know my business, so I didn't ask. But I was -- I learned
13 later that she hadn't been disciplined. She received a --
14 you know, a talk, a verbal warning, but it didn't make -- a
15 verbal warning is still supposed to go in your HR file.

16 Q Did you feel that Dr. Wu treated Hailey better than you?

17 A Absolutely. And she was on probation, too, because she
18 had not been there a year yet. So that could have been
19 grounds for dismissal.

20 Q Now, Ruth, if you can turn to the document that's behind
21 Tab 33, please, in your binder?

22 A Okay.

23 Q And --

24 A I see it.

25 Q -- tell us what this document is?

1 A It's an email from me to Deirdre Walton on February
2 22nd, 2014.

3 Q So this is a few weeks after the discipline you received
4 for oversleeping?

5 A Yes.

6 Q Okay.

7 MR. MUNSHI: And we'd like to move Plaintiff's
8 Trial Exhibit 33 into evidence.

9 MR. HARRIS: No objection.

10 THE COURT: It's admitted.

11 (P-33 received in evidence)

12 MR. MUNSHI: And if we can publish Plaintiff's
13 Trial Exhibit 33, the bottom of that first page going into
14 the second page.

15 BY MR. MUNSHI:

16 Q And, Ruth, if you can read for us -- tell us -- this is
17 an email to Deirdre Walton, correct?

18 A Correct.

19 Q From HR? Tell us what --

20 A In HR. She was in --

21 Q In HR.

22 Tell us what you wrote to Deirdre Walton on -- now this
23 is February 22nd, 2014.

24 A "I want you to understand how distressing it is
25 when I have no one in the department and no one in

1 Human Resources who will listen to me. I am honest
2 and operate with integrity in every area of my
3 life. And five days" -- "and five days out of the
4 week I am badgered emotionally, insulted, ignored,
5 yelled at in front of my peers and called the
6 department scapegoat. I am often accused for
7 mistakes and misconduct of others. And there is no
8 shortage of misconduct around here. It is the" --
9 "it is the irony of my life to be the identified
10 patient in an environment that is beyond hostile.
11 I am appealing to you to assign someone who is fair
12 and unbiased to conduct an investigation for the
13 truth about these two incidents without prejudice
14 in a timely manner. Ruth."

15 Q Ruth, if you can turn to the document that's behind Tab
16 38 in the binder.

17 A Uh-huh. I'm there.

18 Q And tell us if you recognize the email that you sent to
19 Deirdre Walton right on that first page.

20 A I recognize my email. Yes.

21 Q Okay. And tell us the date of now this email that you
22 sent to Deirdre Walton.

23 A Can you repeat --

24 Q Can you just tell us the date of it?

25 A Oh, I'm sorry. March 25th, 2014.

1 Q So now this is a couple of weeks after the last email we
2 just saw, correct?

3 A Correct.

4 Q And this, again, to Deirdre Walton?

5 A Yes, it is.

6 Q Okay.

7 MR. MUNSHI: Your Honor, we move Plaintiff's Trial
8 Exhibit 38 into evidence.

9 MR. HARRIS: No objection.

10 THE COURT: It's admitted.

11 (P-38 received in evidence)

12 MR. MUNSHI: And if we can publish this email?

13 BY MR. MUNSHI:

14 Q And, Ruth, now let's look at your email that you go back
15 to Deirdre Walton of HR, the same Deirdre Walton. And read
16 for us the email that you sent to her on March 25th, 2014,
17 please.

18 A Yes. "I do not know --"

19 Just the highlighted part?

20 Q Yeah. You can go ahead. Yeah.

21 A "I do not know how to respond to this email. I'm
22 drowning here and have reached out to you numerous
23 times and waited and waited. This is affecting the
24 quality of my work life and my personal" --
25 "personal life. All I want is to continue to work

1 without being harassed. Based on the content of
2 your email, I assume that you contacted Drew, Greg
3 and Dr. Wu when I asked you to refrain from doing
4 so because I know that I am" -- "I know that the
5 harassment will escalate without the protection of
6 Human Resources. The story that I am telling" --
7 the story that you are telling me that my
8 discipline is the third story I have heard" --
9 "been told. Drew said that I did not call in and
10 you believed him. I have not" -- "I have not" --
11 no idea" --

12 I think I meant:

13 "-- no idea what Greg said, other than what Drew
14 told me, and he wanted me fired. And you told me
15 that I had not called in or followed procedures.
16 We have no written procedures. And I did call in.
17 And I rushed to work rather than" -- "rather than"
18 -- rather than to" --

19 Wait a minute.

20 "And I rushed to work rather than spend another
21 five minutes to start my computer to send an email
22 stating that same thing I told Taylor" --

23 Who's the student worker.

24 "I was told" -- "was held to an unequal standard
25 and I am suffering the consequences because I

1 cannot bid out for another job. I was told by you
2 that you could" -- "I was told by you to" -- "told
3 by you to that I could bid on a job without stating
4 that I had been disciplined, and I will not lie on
5 an application. I will not retract my comments I
6 made because I believe that" -- "I believe them to
7 be true. Faculty and staff members tell me
8 frequently that the way they" -- "that they feel
9 bad about the manner with which I'm treated and
10 diminished in public. I have nothing more to say."

11 Q Ruth, let's look at another email you sent. It's behind
12 Tab 34 in the binder. It's 34. Yeah.

13 A I have it.

14 Q And tell us if you recognize this email.

15 A I do.

16 Q Who is this email to?

17 A To Sandy Foehl.

18 Q Sandy Foehl from the Equal Employment Compliance Office?

19 A That is correct.

20 Q Okay. And this same Sandy who you had spoken with
21 before?

22 A Yes, it is.

23 Q Okay.

24 MR. MUNSHI: Your Honor, we move Plaintiff's Trial
25 Exhibit 34 into evidence.

1 MR. HARRIS: No objection.

2 THE COURT: It's admitted.

3 (P-34 received in evidence)

4 MR. MUNSHI: And let's have 34 up on the screen,
5 please.

6 BY MR. MUNSHI:

7 Q And, Ruth, tell us the date of this email you sent to
8 Sandy.

9 A It's February 25th, 2014.

10 Q Okay. So were you -- you sent an email to Sandy around
11 the same time? Okay.

12 Read us this email that you sent to Sandy.

13 A "Dear Sandy, I've tried desperately to make my work
14 situation tolerable. All my family and friends say
15 that I need to take a more proactive defense
16 against my supervisor and two managers in the
17 Dean's office. But I've reached my breaking point,
18 and I need to be concerned with repairing my
19 professional reputation. On numerous occasions,
20 I've spoken to Deirdre Walton who has not been
21 helpful or timely at all. I plan to file an EEOC
22 complaint internally, and I have already had a
23 phone intake with the EEOC on the outside."

24 Q And what did you mean by "the EEOC on the outside"?

25 A The Equal Employment Opportunity Commission office.

1 Q Outside of Temple?

2 A Outside of Temple. Yes. I had already had an intake
3 with them over the phone.

4 Q Okay.

5 A And I was asking her to -- and I was giving her
6 permission to file internally on my behalf.

7 Q Let's talk about -- you ultimately did, then, meet with
8 Sandy, correct? After this email.

9 A I -- I might have.

10 Q Let me take you to April 1st, 2014.

11 A Oh, right. April. How could I forget that?

12 Q I know. There are a lot of dates.

13 A Yeah. April 1st. Yeah.

14 Well, I -- what I -- oh.

15 Q Just tell us about your meeting.

16 A What I did, okay.

17 On April -- I could see what -- I really felt I was
18 going to lose my job. I felt so retaliated against. And I -
19 - I decided to -- that I wanted to file that internally. And
20 so I made an appointment with Sandy the week before, for
21 April 1st, which was a -- I believe it was a Monday. And I
22 had an appointment with her at 10 o'clock in the morning,
23 which I attended.

24 Q What did you discuss with Sandy at that meeting?

25 A I wanted -- that I wanted -- that -- you know, just to

1 go over that I had filed an external -- you know, an external
2 complaint with the EEOC and that I wanted her to move
3 forward.

4 Q Did you discuss discrimination during that meeting?

5 A Yes, I did. About my age --

6 Q Did you discuss retaliation?

7 A -- my -- my gender and retaliation.

8 Q Okay. Ruth, did you ever learn from anyone that Dr. Wu
9 knew about your complaints?

10 A I did.

11 Q Tell us about that.

12 A Not from him, though. I -- Andrew DiMeo --

13 MR. HARRIS: Objection to hearsay.

14 THE COURT: Sustained. Hearsay.

15 MR. MUNSHI: Your Honor, if permitted to testify,
16 she will tell us about a conversation with an individual at
17 Temple, and it will be a party opponent admission.

18 THE COURT: You know, and I'll reverse my decision
19 because I don't think they're being offered for the truth of
20 the matter asserted, but for the fact that it was stated.

21 MR. MUNSHI: All right.

22 BY MR. MUNSHI:

23 Q Ruth --

24 A I'm confused.

25 Q That's okay.

1 Ruth, did you ever learn that Dr. -- did you ever learn
2 from anybody about Dr. Wu knowing about your complaints?

3 A Yes. From Andrew DiMeo and from Greg Wacker.

4 Q Tell us what you learned from Mr. DiMeo.

5 A I -- I remember meeting with him first in his office and
6 told him and -- and he told me, he says, like, Dr. Wu knows
7 what's going on, and I'm -- you know, and it's got to stop.
8 And then Greg Wacker is in the same office. He told me that
9 Dr. Wu knows what you're doing and if you want your job, you
10 better cut it out.

11 Q Did you ever tell Drew DiMeo that you were speaking with
12 Sandy Foehl from Equal Employment?

13 A Yes.

14 Q So let's go back to April 1st, 2014.

15 What happens after you leave Sandy Foehl's office?

16 A Well, Greg -- actually, Greg called me when I arrived in
17 the morning and said, we have a meeting in the Dean's office
18 at 10 o'clock in the morning. And I was meeting with Sandy
19 at 10. So I told him that I -- I needed to make it a little
20 later. And he said 10:30 would be fine.

21 So I met with Sandy. I didn't even go back to my
22 office. I just went directly to the Dean's office to Greg's
23 -- where Greg is. And Deirdre Walton was there. And they
24 took me into a conference room and handed me a letter that
25 said that I was being terminated by the end of the day.

1 Q And if you can turn to the document behind Tab 45,
2 please?

3 A Okay.

4 MR. MUNSHI: And if we can publish Plaintiff's
5 Trial Exhibit 45. I believe it's already in evidence.

6 MR. HARRIS: No objection.

7 THE COURT: It may be admitted.

8 (P-45 received in evidence)

9 BY MR. MUNSHI:

10 Q And is this the letter, Ruth, that they handed to you on
11 April 1st, 2014?

12 A Yes. Yes, it is.

13 Q Can you -- can we just highlight the last sentence of
14 this letter?

15 And if you can read that out loud for us? "Effective
16 the end of the day today."

17 A "These infractions occurred despite --"

18 Q No. Just the last sentence, I said.

19 A Oh, the last sentence.

20 "Effective the end of the day today, your
21 employment at Temple University is being
22 terminated."

23 Q So within this termination letter, there are two bullet
24 points.

25 MR. MUNSHI: If we can go back to just the ...

1 THE WITNESS: Yes

2 BY MR. MUNSHI:

3 Q There are two bullet points that describe two different
4 situations that they say in this letter led to your
5 termination. Let's talk about those two, okay?

6 A Yes.

7 Q The second bullet point says you were directed to book a
8 room reservation. Do you see that?

9 A Yes, I do.

10 Q Okay. What happened here? Tell us what happened with
11 Dr. Ness Shroff.

12 A I -- there was one overlap in the day. I had -- I think
13 that when -- my -- I maybe booked it the -- his stay on
14 campus in Cumberland from like the 12th to the 13th rather
15 than the 13th to the 14th.

16 Q How did you learn that the dates were supposed to be --
17 how did you learn what the dates were supposed to be?

18 A Well, Dr. Wu told -- asked me to book them.

19 Q Did the dates ever change from what you were originally
20 told?

21 A I -- it was a verbal request. I -- you know, I recall
22 that there was some changing in that. But I don't have it,
23 you know ...

24 Q And as a result of any change that may have happened,
25 did you in fact book a hotel?

1 A Yes. I was able to get him lodging for that night and
2 it was all -- it was fixed. It was not a problem.

3 Q And securing lodging for a guest, is that a job duty and
4 responsibility that you had had?

5 A Yes, it was.

6 Q And for how many years had you been doing that job duty
7 and responsibility?

8 A Since 2005. You know, it -- it's in my role as an
9 executive assistant.

10 Q Let's look at the first issue that's in this termination
11 letter. And this is regarding Concur and Focal, and you
12 mentioned this a little bit before. But let's just go
13 through it in a little bit more detail.

14 And, in fact, what I'm going to ask you to do, Ruth, is
15 look in the other binder that's up there in front of you, the
16 other big binder. And I'm going to ask you to turn to --

17 MR. MUNSHI: Actually, Your Honor, it might be
18 easier. I can just hand up --

19 THE COURT: Sure.

20 MR. HARRIS: Your Honor, may I know what document
21 we're --

22 MR. MUNSHI: It's Defendant's 71.

23 MR. HARRIS: Thank you.

24 THE WITNESS: Okay.

25 BY MR. MUNSHI:

1 Q Ruth, in front of you is a document that's been marked
2 as Defendant's Exhibit 71. And you can just take a look at
3 it and tell me if you recognize this email chain.

4 A I do recognize it. Yes, I do.

5 Q And do you recognize it as an email chain between you
6 and Drew DiMeo and Dr. Wu?

7 A Could you repeat the question? Sorry.

8 Q Right. Is this an email between you and Drew DiMeo and
9 Dr. Wu?

10 A Yes.

11 MR. MUNSHI: Okay. Your Honor, we move D-71 into
12 evidence.

13 MR. HARRIS: No objection.

14 THE COURT: It's admitted.

15 (D-71 received in evidence)

16 BY MR. MUNSHI:

17 Q So let's just look at D-71, and let's pull this up so
18 the jury -- the jury can see it. Let's go to the first email
19 in this chain.

20 A March 20th? March 20th one?

21 Q March 20th --

22 A Okay.

23 Q -- exactly.

24 A Uh-huh.

25 MR. MUNSHI: No, the first email in the chain.

1 A Oh, the first email. I'm sorry. Okay.

2 Q So this is an email that you're CC'd on. Do you see
3 that?

4 A Uh-huh.

5 Q And do you -- when -- within your job duties as the
6 Executive Assistant, were you responsible for doing travel
7 reimbursements?

8 A Yes.

9 Q Is that a job duty and responsibility that you had had
10 for years?

11 A Yes.

12 Q Okay. And very briefly, high level, what do you do when
13 you do travel reimbursements? What systems do you use? What
14 do you need?

15 A I use a system on -- it's an internal system called
16 Concur, and it does all travel, booking reservations to
17 reimbursement, travel reimbursements.

18 Q And in order for you to do this job of the
19 reimbursements, what kind of tech access do you --

20 A Okay. I'm -- on -- some -- someone in Computer Services
21 gives me access to Dr. Wu's grant information, when -- I
22 guess when the Dean's Office, you know, gave him permission
23 to do so. So I -- any one of -- and Dr. Wu's active grant
24 said he was using for -- to -- to, you know, submit travel
25 and reimbursements, I had access to those.

1 Q Can you, yourself, get access, or does someone have to
2 give you access?

3 A I have to be given access.

4 Q Okay. Let's look at the next email in the chain, which
5 is Thursday, March 20th, 3:56 p.m. --

6 A Uh-huh.

7 Q From Drew DiMeo to you.

8 A Uh-huh. I see it.

9 Q And read for us what Drew says here.

10 A Okay.

11 "Ruth, I confirmed that the" -- "this account is
12 available in Concur. Dr. Wu is requesting that you
13 enter the expense in Concur by 5 p.m. today. If
14 you have any questions, please email me."

15 Q And this is at 3:56 p.m., on March 20th, 2014.

16 A That's --

17 Q Is that right?

18 A That is correct.

19 Q Let's look at the next email in this chain. And if we
20 can look at that whole thing. Tell us the date and time of
21 this email?

22 A It is -- it's March 20th, 2014, 5:27 p.m.

23 Q So this is about an hour and a half later.

24 A Right.

25 Q Okay. An hour and a half later from the email that Drew

1 sent you, that we just read?

2 A Correct.

3 Q Okay. So we -- this is --

4 A Okay.

5 Q This is your email to Drew --

6 A To Drew.

7 Q -- correct?

8 A To Drew.

9 Q Yeah.

10 A I was -- I was just telling him what I had access to.

11 So the --

12 Q Starting with --

13 A -- number --

14 Q -- this email, yeah.

15 A Okay.

16 "Drew, I have" -- "the number I have for the JENIE"

17 (phonetic) --

18 It's an acronym for a grant.

19 "-- on the spreadsheet is 330155-132. It does not

20 appear as an option for allocating expenses. I

21 have the following fund numbers."

22 Q And you provide a series --

23 A And I provide him with -- one, two, three, four, five,

24 six, seven, eight -- nine other fund numbers that I could

25 have used.

1 Q And then can you read these last two paragraphs of your
2 email on March 20th?

3 A "There has been no change since we talked about
4 this last week. Is this a permission issue for
5 delegates, perhaps? I don't know. And LaMas"
6 (phonetic) --

7 Who was in the Travel Reimbursement Office.

8 "-- has not gotten back to me. If you know the
9 name of the IT person for Concur, it may have to do
10 with the" -- "with the delegate access, but I'm
11 just guessing."

12 Q So, after you get the email from Drew DiMeo at 3:56 p.m.
13 on March 20, walk us through what you did --

14 A Okay.

15 Q -- the rest of the day --

16 A Okay.

17 Q -- in order to do the assignment.

18 A Well, the -- actually, the -- you know, his expenses had
19 already been entered. I had entered -- you know, entered
20 them. The final process is to allocate them to -- to, you
21 know, a -- a FOPL number (phonetic). And that's what --
22 that's what we were talking about, I don't have what he
23 wanted me to -- you know, to -- to use that as -- to submit
24 it through that one. And I was asking if there was somebody
25 I could contact to give me permission that night, like

1 someone in -- over in Computer Services that could fix that.

2 Q And your email to Drew DiMeo was at 5:27 p.m.

3 A That is correct.

4 Q After you sent that email to Drew DiMeo, did you try to

5 --

6 A I stayed --

7 Q -- continue to provide it?

8 A I did. I even -- I thought maybe I -- maybe I could
9 make -- give myself access to it. And I played around with
10 it, but I couldn't. But the report was in there, it just
11 wasn't allocated.

12 Q And is this a job duty that you had -- an assignment
13 that you had done before?

14 A New -- oh, all the time, a big part of my job.

15 Q The next day, this email is -- your last email is 5:27
16 p.m., on Thursday, March 20th. The next day, do you recall
17 meeting with Drew and Dr. DiMeo -- Dr. Wu?

18 A Yes, I do.

19 Q Tell us about that meeting.

20 A I -- I came in, when I first came in, and I went into --
21 was called into their office, and they told me that the --
22 that I had failed to complete the assignment.

23 Q How did you reach?

24 A I said I had completed the assignment, that I couldn't
25 allocate the expenses to a grant. They were put in, but I

1 couldn't allocate them. And Drew -- Drew told me that I was
2 not telling the truth, that I, in fact, did have access to
3 that. And I asked them if they would go -- you know, go with
4 me, and let -- let them show me what I saw because I'm -- I'm
5 pulling up the screen for me. And I wanted that -- and
6 didn't -- and they said they didn't -- no, they wouldn't --
7 didn't need to do that, that I was lying.

8 And I -- I was -- I was called a liar, and I was angry.
9 And I -- and I said, I -- you know, I had -- I had to walk
10 out. I -- I thought I was going to cry.

11 Q So these two issues, the Concur issue that we're talking
12 about right now and the hotel booking issue, those are the
13 two that are on the --

14 A For -- yeah.

15 Q -- bullet points of your termination letter?

16 A Yes. C-level violations.

17 Q Ruth, tell us what it was like to receive a termination
18 letter from Temple after 13 years there?

19 A It was just confirming what I thought to be the case for
20 me. I knew that they were after me, I knew I was being
21 discriminated against because of my age and my gender. And I
22 -- my -- you know, after awhile, it was clear that there was
23 retaliation because I was reaching out to so many different
24 people in a way I thought -- I wasn't trying to be a nudge, I
25 wasn't trying -- I was really asking for help. I wanted

1 help, I wanted to make this work. I wanted to mediate it. I
2 didn't want it to be adversarial. And I -- I could hardly
3 breathe, to be honest with you. I had just left Sandy
4 Foehl's office, who was supposed to protect me, and I'm
5 fired. I mean, within 30 minutes, I was fired.

6 Q Ruth, let's look at the document that's behind Tab 46 in
7 your binder.

8 A Okay. I see it.

9 Q And do you recognize this email?

10 A I do.

11 MR. MUNSHI: Your Honor, we move Plaintiff's Trial
12 Exhibit 46 into evidence.

13 MR. HARRIS: No objection.

14 THE COURT: It's admitted.

15 (P-46 received in evidence)

16 MR. MUNSHI: And we're going to show the jury.

17 BY MR. MUNSHI:

18 Q Ruth, now can you tell us the date of this email that
19 you sent to Sandy Foehl?

20 A It's April 2nd, 2014, the day after I was fired.

21 Q Okay. And Ruth, let's have you read what you write to
22 Sandy Foehl --

23 A Okay.

24 Q -- the day after you're fired.

25 A "Thank you for meeting with me yesterday. I'm

1 providing all the documents, except for the
2 termination letter. I'm afraid that, yesterday, I
3 was operating on autopilot and do not know what box
4 holds my termination letter. I don't have a car.
5 My finger" -- "I had crushed" -- "my finger is
6 crushed, and I am unable to carry the boxes home,
7 so my" -- "my personal photos, books, and documents
8 are packed in my former office. I hope that the
9 Dean's Office staff will not violate my integrity
10 and privacy again. As soon as I am able to collect
11 my belongings, at a time convenient for them, I
12 will send a copy of the letter to you. This has
13 never happened to me before, and I am so full of
14 grief. Of course, I fear the financial disaster I
15 will face when I have no rent and utilities to pay
16 on May 1st. But I miss" -- "all" -- "I miss the
17 only community I have since my children have left
18 home, the Temple undergrads, the grad students, and
19 an incredible group of inspiring faculty members.
20 A wave of grief has pulled me under and"
21 (indiscernible) "hard to breathe. I hope" -- "I
22 hope you will file the complaint in a timely
23 manner. It is unfortunate that I will lose my
24 medical insurance at a time when I have a reason
25 and need. The open fracture I've sustained in the

1 sculptor's studio might require hand surgery, which
2 I hope can be completed by April 30th. And I do
3 not want to be afraid of them anymore."

4 (Pause in proceedings)

5 Q Ruth, can you look at one more email behind Tab 53 in
6 that binder?

7 A This one? This binder?

8 Q Yeah.

9 A Okay. I'm there.

10 Q And Ruth, do you recognize this email?

11 A Yes, I do.

12 Q And can you tell us the date and to whom you sent this
13 email?

14 A April 21st, 2014.

15 MR. MUNSHI: Your Honor, we move Plaintiff's Trial
16 Exhibit 53 into evidence.

17 MR. HARRIS: No objection.

18 THE COURT: It's admitted.

19 (P-53 received in evidence)

20 MR. MUNSHI: And if we can show the jury
21 Plaintiff's Trial 53.

22 BY MR. MUNSHI:

23 Q And Ruth, if you can read to us the last two paragraphs
24 of your email to Sandy Foehl on April 21st, 2014.

25 A "If you can give me a time line on this manner, I

1 would greatly appreciate your reply. I'm permitted
2 to bid on positions within the university and do
3 not know the manner with which to proceed with a
4 bid, and hopefully an interview, in light of this
5 situation. I just wanted to disappear. I can't
6 tell you how difficult this has been for me, to be
7 banished from my professional family. Even as the
8 situation deteriorated, my respect for the
9 university mission, our students, our faculty never
10 faltered. Because Jie Wu" -- "Because Jie Wu has
11 yet to inform his faculty and our students, I
12 continue to get requests for assistance from them,
13 for which I have no choice but to tell them that I
14 am no longer a member of the Department. I" -- "my
15 prospects to find full-time employment with a
16 similar salary, health insurance, and contributions
17 to my retirement account are slip. My two sons and
18 I will lose health insurance on April 30th, and the
19 rent must come from my retirement account, for
20 which the penalty will be substantial to my
21 current" -- "to my current and future financial
22 status. My distress is not unreasonable,
23 especially when my termination resulted because the
24 standards to which I was held were unfair and
25 unequal. I hope that you will consider this as" --

1 "as you move to investigate my complaint."

2 Q And this email, Ruth, is a couple of weeks after you had
3 been --

4 A Yeah, a -- the -- yes, about three weeks.

5 Q You mentioned, Ruth, in your email, that various of the
6 faculty members had reached to you in this period?

7 A Yes.

8 Q Can you turn to one more email, please, behind Tab 51?

9 A Okay.

10 Q And tell us if you recognize this email chain.

11 A I do.

12 MR. MUNSHI: Your Honor, we move Plaintiff's Trial
13 Exhibit 51 into evidence.

14 MR. HARRIS: No objection.

15 THE COURT: It's admitted.

16 (P-51 received in evidence)

17 MR. MUNSHI: And if we can show Plaintiff's Trial
18 Exhibit 51.

19 BY MR. MUNSHI:

20 Q Tell us the date of this email chain, Ruth, please.

21 A It is April 7th, 2014.

22 Q So this is after you've already been let go by Temple,
23 correct?

24 A Correct.

25 Q And the email that you sent is to Slobodan --

1 A Slobodan Vucetic.

2 Q And who is he at Temple?

3 A At the time he was a tenured faculty member in the
4 Department. I believe he's Chair now, though.

5 Q And describe for us, what are you telling Slobodan in
6 this email?

7 A I -- I got a call from Judy Lennon, that she needed to
8 do the Future of Computing, which is an annual -- an annual
9 competition the Department holds for high school students,
10 undergrads, and grad students, which I have done -- had done
11 since I started there. And I told her that I had already
12 made the arrangements, and that I would let Slobodan know.

13 Q Read for us, if you could, Ruth, what you sent to
14 Slobodan after you had already been terminated at Temple.

15 A Okay.

16 "Dear Slobodan. This email is from housekeeping
17 regarding the setup of tables, chairs, and
18 breakdown for the Future of Computing this
19 Saturday. I can no longer access to you
20 Marketplace from the" -- "from" -- "for the
21 original requisition. Perhaps Andrew DiMeo can
22 provide the original requisition to you. Jim" --
23 "Jim's email states that he is providing an
24 estimate that I" -- "that I requested. The charges
25 look much higher than last year. The charges for

1 last year are available on the network drive in the
2 file for" -- "called 'Future of Computing 2013.'
3 The floor plan for this coming Saturday can be
4 found in the same folder under 2014. The
5 electrician estimates" -- "estimate for this" --
6 "for this year can be found in this folder. You
7 will need someone to" -- "to place the food order
8 with 7-Eleven, the best price and most convenient,
9 immediately. Chrissy is the Day Manager at 7-
10 Eleven, and is anticipating receiving the order" --
11 "this order Saturday. The coffee should also be
12 ordered at the same time. I spoke to her this" --
13 "the week before I was terminated, and she asked me
14 to place the order" -- "to place the order at the
15 beginning of" -- "the beginning of the week. This
16 will be paid with Diamond Dollars" --

17 Which is -- it's -- it's money -- it's -- it's like a --
18 you know, a -- like a gift card or something that they put
19 money on, that you can buy things at -- you know, on campus.
20 7-Eleven was on campus, so ...

21 "In the past, I purchased the plates, utensils,
22 napkins, and canned sodas from Fresh Grocer, and
23 set everything up myself. I will resend the email
24 from the electrician. The service has been
25 confirmed, and he will set up around 9 a.m. on

1 Saturday. Please have Judy contact Breslin"
2 (phonetic) "in Housekeeping to confirm the services
3 outlined in this email. I have not confirmed" --
4 Meaning I have not confirmed it. "It would be" -- keep
5 going?
6 "It would be best if you could have someone there
7 to cover the things that I did; i.e., preparing
8 supplies for the day before, basic office supplies,
9 pens, staplers, double-sided tape, hanging posters,
10 judging sheets, on the network drive, too, name
11 tags and magic markers. Please tell the staff
12 member assisting you the food will not be delivered
13 and should be picked up at 8 from 7-Eleven. The
14 student workers who work the event helped me
15 picking up the food last" -- "food and coffee. I
16 did setup and cleanup, returned to the" --
17 "returned the coffee urns to the 7-Eleven. The
18 person should plan" -- "should plan to be on campus
19 no later than 7:45 a.m., to get the food from 7-
20 Eleven, pick it up, pick up" -- "pick up the boxed
21 supplies from the Department for delivery into the
22 13th Street entrance of Burey Hall," (phonetic)
23 "each of which must be returned to 7-Eleven and the
24 Department after the event. The area is public,
25 and nothing can be left out for later pickup.

1 Anything left behind will be discarded by the --
2 will be discarded by housekeeping. My blue ice
3 chest is on the 10th floor of Cornell under my desk
4 in the kitchen area, and you will" -- "and you are
5 welcome to use it for this event" (indiscernible)
6 in parenthesis (indiscernible) "the ice chest is
7 mine, please" -- "please remember to bring it back
8 after the event, so that I can get" -- "get it when
9 I pick up my personal belongings next week. I
10 should also take extra" -- "I should also take an
11 extra paper table" -- "you should also take" --
12 "take extra paper tablecloths for pack" -- "for
13 back which are in the filing cabinet directly
14 outside my" -- "my former office."

15 Q Let's go to the last part of your email.

16 A "Please tell the person who will fill in for me
17 that they will need to be early so the setup and" -
18 - "for the setup and stay after the event to gather
19 and return items, 7-Elevens urns and baskets, as
20 well as the Department's supplies, and my ice chest
21 to Walkman."

22 The hall, that's where I was located.

23 "There was a lot of lifting, carrying, and setting
24 up. I did ask student workers to help me with
25 picking up the food from the morning, but I did the

1 rest of it myself. It is too much" -- "if it is
2 too much for one staff member, scheduling another
3 person may be necessary. I'm certain that it will
4 be another successful competition."

5 Q Ruth, tell us. Why did you send this whole email to
6 Slobodan at Temple, a week after you were let go?

7 A Because it was an assignment that -- it was my
8 assignment, and I always did the Future of Computing. And
9 this year, Slobodan Vucetic was the one -- the faculty member
10 who was my contact. And if I recall, he contacted Judy, and
11 Judy had told him to contact me.

12 Q But why did you respond? You were --

13 A Oh, why did I respond?

14 Q Why did you respond?

15 A Because it was -- you know, I -- I've done this
16 competition for so many years, and it was -- I didn't want it
17 to fall apart. And then, when -- I didn't want to leave
18 Slobodan holding the bag.

19 Q Did you ever seek compensation for this work?

20 A No. But I didn't anticipate -- I mean, I was doing this
21 as a favor to Slobodan.

22 Q Ruth, after you were terminated by Temple, did you then
23 apply for jobs at Temple?

24 A Many, yes, I did.

25 Q If you can look at the documents behind Tab 59 of your

1 binder.

2 A Yes.

3 Q And tell us if you recognize that?

4 A Yes, I do recognize this.

5 Q And what is that?

6 A This is -- this is from Temple's website, and it's --
7 it's jobs that I bid on after I left.

8 MR. MUNSHI: Your Honor, we move Plaintiff's Trial
9 Exhibit 59 into evidence.

10 MR. HARRIS: No objection.

11 THE COURT: Admitted.

12 (P-59 received in evidence)

13 MR. MUNSHI: And if we could just show the jury 59,
14 and just highlight the various jobs on the bottom. Yeah.

15 BY MR. MUNSHI:

16 Q So, Ruth, do you see that these are various jobs at
17 Temple?

18 A Yes.

19 Q And are these the ones that you had applied to at
20 Temple, after you --

21 A After my --

22 Q -- were terminated?

23 A Yeah, after my -- yes.

24 Q Can you read us the various titles of these positions?

25 A Faculty Recruiter, Admissions Counselor, Department

1 Coordinator, Administrator -- Administrative Operators
2 Coordinator, Community Outreach Coordinator, Research
3 Associate 3, Student Services Coordinator, Senior
4 Administrative Specialist, Coordinator for the Annual Fund
5 for Athletics, Research Specialist, Technical Writer,
6 Community Outreach Worker, Program Manager, Event Planning
7 Coordinator, and Tristate Regional Coordinator.

8 Q Were you offered any of those?

9 A I was -- I was interviewed for the Tristate Regional
10 Coordinator.

11 Q How about the other 14 jobs that you applied to at
12 Temple; did you get an interview?

13 A No.

14 Q Were you offered a job by Temple?

15 A No, I was not, although I had a really good interview.

16 Q Let's go to the second page of this same document.

17 A Okay.

18 MR. MUNSHI: And I'd like to highlight, and let's
19 show the jury the bottom page, the bottom part of the page.

20 THE WITNESS: Okay. All right.

21 BY MR. MUNSHI:

22 Q And do you see where it says "your active job alerts
23 will be in effect"?

24 A Yes, I do.

25 Q What are these positions?

1 A I'm sorry?

2 Q What are these positions?

3 A Until -- when are they?

4 Q What are these titles?

5 A Oh, jobs that I applied for.

6 Q Can you read us the titles?

7 A Research Associate, Assistant Director, Post --

8 I don't know how the whole title -- Post Awards something,

9 Assistant Director of Development -- and I think it was

10 Alumni Affairs -- Violence Prevention Coordinator, Faculty

11 Recruiter, Senior Technical Support Specialist, Assistant

12 Director Alumni Relations, a CI Trainer, Associate Health

13 Physicist -- I can -- I don't know what the rest of it is.

14 Q Okay. And do you see, on the third page, that there are
15 even more jobs that you're getting job alerts for?

16 A Yes, I do see them.

17 Q And all of these are after you had been let go by
18 Temple, right?

19 A Yes, they are.

20 Q And by the way, yesterday, when Dr. Wu testified, do you
21 recall him stating that an individual named Marilyn Grandshaw
22 was --

23 A She --

24 Q -- took over and replaced you?

25 A Yes, I do.

1 Q And do you know how old Marilyn Grandshaw is?

2 A Well, actually, I do -- we -- because I looked in
3 LinkedIn for it. Forty-six.

4 Q Tell us, Ruth -- we've talked a little bit about the
5 different jobs that you had at Temple. But let's talk more
6 generally about after you were terminated by Temple. Tell us
7 about your job search.

8 A It was pretty intensive. You have to do most things
9 online, you can't even go in and apply. Is it -- do you have
10 a tab for that? You -- I don't -- I applied for -- I -- over
11 a hundred jobs. And it went from, you know, within my realm
12 of experience to a cashier at Whole Foods.

13 MR. MUNSHI: Your Honor, may I approach with an
14 exhibit. It's premarked as Plaintiff's Trial Exhibit 66. It
15 was just too big to put in a binder.

16 MR. HARRIS: No objection.

17 THE COURT: All right. You may.

18 THE WITNESS: Thank you.

19 BY MR. MUNSHI:

20 Q And Ruth, I'm not going to ask you to read everything in
21 that.

22 A Thank you.

23 MR. HARRIS: And I thank you.

24 Q But Ruth, if you can just tell us what that stack of
25 documents, Plaintiff's Trial Exhibit 66, what that is.

1 A These are email confirmations, you know, ones I
2 submitted my application and letters, and whatever documents
3 they requested online.

4 MR. MUNSHI: Your Honor, we move Plaintiff's
5 Exhibit 66 into evidence.

6 MR. HARRIS: No objection.

7 BY MR. MUNSHI:

8 Q And Ruth, just --

9 THE COURT: It will be admitted.

10 (P-66 received in evidence)

11 BY MR. MUNSHI:

12 Q Without going through every single email there, just
13 talk to us about the various places that you applied to, your
14 efforts to find another job.

15 A I -- I really wanted to stay in higher ed. I -- I -- I
16 really loved it. I -- I -- I didn't get very many
17 interviews, to be honest with you. But one interview I got
18 was with CCP -- I'm sorry -- Community College of
19 Philadelphia, and it was pretty much doing the same thing I
20 was doing in the Dean's Office. It had to do with faculty
21 recruitment.

22 And I had an interview with two women, and I was -- came
23 right up front and told them that I was -- that I resigned
24 from -- from Temple because I, in fact, was asked to resign,
25 after I was fired.

1 MR. HARRIS: I'm sorry. Your Honor, I didn't hear
2 her response.

3 THE WITNESS: Okay. Okay. I said -- I was very
4 honest with the -- the two women who interviewed me. I think
5 it was the Dean and -- and one of her associates, for the
6 interview at CCP.

7 BY MR. MUNSHI:

8 Q So you're talking to us about an interview that you had
9 at the Community College of Philadelphia?

10 A Right.

11 Q Okay. How many jobs did you apply for that did not
12 result in an interview?

13 A That would be the rest of them.

14 Q Approximately how many?

15 A Over -- you know -- I -- not -- over a hundred. I mean,
16 I can count them if you want me to.

17 Q And beyond searching for a job online, what else did you
18 do to look for a job?

19 A I decided to just walk around and -- and -- and put in
20 applications in stores and -- and --

21 Q For what kind of jobs?

22 A Cash -- like cashier, clerk kinds of things.

23 Q And --

24 A And I didn't get them. That was a real letdown.

25 There's someone with more, higher qualifications than I, as a

1 cashier.

2 Q How did that make you feel?

3 A I -- I thought this was the end -- I really -- you know,
4 I really did. I thought that I was going to -- I was so
5 distraught. I was going to let my children down. I had no
6 money, and I couldn't even get a minimum-wage-hour job. I
7 was not well. I had asthma, and I had been hospitalized. I
8 had crushed my finger, you know, right before I left. I
9 mean, I had so many things going on, and I --

10 Q Were you also --

11 A I'm pretty much bankrupt. I mean, I didn't file
12 bankruptcy. But you know what? Because I don't have
13 anything. But I lost everything. I finally -- you know
14 what? I finally looked into senior housing, subsidized
15 housing in Philadelphia, through the Philadelphia Commission
16 on Aging. And the ones I looked at were like you could smell
17 urine in the hallways, and it was -- it was so -- you know, I
18 knew I was going to have to make this move because I couldn't
19 afford my apartment. But I thought that that was one step
20 before I stepped into my grave, if I moved into there. And I
21 was just about ready to give up, and I was able to find
22 another source for subsidized housing, for people in
23 situations like mine, that wasn't in a senior home.

24 Q Ruth, were you ultimately able to find a job?

25 A I -- I did. I found a job as -- as a home health aide

1 to a disabled woman, that -- she's totally disabled, through
2 Liberty Home Resources, is what it's called. It's a staff --

3 Q And when did you start with her?

4 A It was August of two years ago, so it was 2014. Yeah.
5 No, 2016. So I've been with her almost two years.

6 Q So, from April 1st, 2014, when you left Temple, you were
7 terminated by Temple, until August of 2016, did you have any
8 jobs?

9 A No, I did not.

10 Q And how much do you make as a home healthcare nurse?

11 A I -- I make ten seven -- \$10.70 an hour now; I started
12 out at 10.50.

13 Q And while you were working at Temple, what was your
14 annual salary?

15 A From 50,000, with benefits.

16 Q And Ruth, if you can turn to 62, the Tab 62 in your
17 binder.

18 A Okay.

19 Q And on the eleventh page of that document, do you see a
20 description of the different health insurance benefits --

21 A Yes, I do.

22 Q -- and other benefits that you received at Temple?

23 A Yes, I do.

24 Q During those two years, Ruth, where you didn't have a
25 job, what did you do for health insurance?

1 A I didn't have it.

2 Q And then you start working in August of 2016. And I'm
3 sorry. I cut you off. Can you just tell us what you
4 actually do for work now?

5 A I -- I take care of this woman, she's -- I'm like her --
6 I'm her arms and her legs. She's wheelchair bound. I bathe
7 -- I get her up in the morning and I bathe her. I help her
8 cook. I go -- go out with her when she needs -- when she's
9 going to the doctors, or sometimes I'll go -- and I do -- go
10 shopping for her. She -- I've -- I do -- I work -- like I
11 did at Temple, I work well beyond the hours I'm paid and --
12 I'm not complaining about that because I -- I could -- I
13 could be in her shoes, I could be there.

14 Q And at the \$10.70 that you're -- that you've been
15 making, in total, how much have you made working at -- as a
16 home healthcare aide for two years?

17 A It's -- it's about 22,000 a year, so two -- it's been
18 two years now, so forty-four.

19 Q You talked to us, Ruth, about subsidized housing. But
20 describe for us, in light of the amount that you're making,
21 how have you made it work over the last four years? How have
22 you been able to get by?

23 A This is really difficult for me. I've -- I'm in a place
24 now that I've worked really hard to get to where I was as a
25 single mom.

1 MR. HARRIS: I'm sorry, Your Honor.

2 A Now I'm --

3 MR. HARRIS: I apologize, Your Honor

4 A Now I'm paying for -- excuse me. I'm sorry.

5 MR. HARRIS: I'm sorry. May we --

6 A I didn't hear you.

7 MR. HARRIS: -- be seen at sidebar, briefly, Your
8 Honor.

9 THE COURT: Yeah.

10 MR. HARRIS: I apologize for interrupting.

11 THE WITNESS: I'm sorry, I didn't hear you.

12 MR. HARRIS: I apologize.

13 THE WITNESS: That's okay.

14 (Sidebar)

15 THE COURT: Yes?

16 MR. HARRIS: Your Honor, it's just the same motion
17 as before. I mean, I don't believe that question elicited an
18 emotional reaction like the witness is basically crying --

19 THE COURT: Oh, I know, but I don't know what we
20 can do.

21 MR. HARRIS: Well, if she needs to compose herself,
22 then maybe we should have the jury go out for a second --

23 THE COURT: No.

24 MR. HARRIS: -- so that she can compose herself.

25 THE COURT: I don't want to do that.

1 Are you almost finished?

2 MR. MUNSHI: (indiscernible)

3 THE COURT: Let's see if we can finish.

4 MR. HARRIS: Okay. Thanks.

5 (Sidebar concluded)

6 BY MR. MUNSHI:

7 Q Ruth.

8 A Yes.

9 Q Before we just took that break, you were telling us how
10 you had been able to survive financially --

11 A Yeah.

12 Q -- over the last four years. Can you tell us?

13 A I'm on food stamps. I was getting free care from a
14 health clinic -- for -- you know, from a -- you know, a
15 clinic. And I get subsidized rent, based on what I make. So
16 it -- the market value for my -- where I -- I'm living is
17 about \$1,000, and I get -- I pay 560 a month for that in
18 rent.

19 Q How is your retirement fund?

20 A It's -- there's probably about four to \$5,000 left in
21 it.

22 Q How much was in there when you left Temple?

23 A A hundred thousand.

24 Q For how many years do you plan to keep working for,
25 Ruth?

1 A I had -- you know, to be perfectly honest with you, I
2 had never even considered retirement. I -- maybe I just
3 didn't -- it wasn't on my radar at all. So I didn't like
4 have a target date, it never even occurred to me. I had
5 planned to leave that money for my kids, to take care of
6 their brother, when I'm gone. I know it's not much, but it
7 would have helped them take care of their brother, who's
8 disabled.

9 Q And lastly, Ruth, you had mentioned your family a few
10 times. And tell us about how this experience -- how it's
11 affected any relationships you've had with any of your
12 family?

13 A My three grand -- I think the proudest role I've ever
14 been called is -- I have been called is Mimi, and that's
15 grandmother to my grandkids. And that first Christmas, when
16 I didn't have anything, I didn't have -- I couldn't even put
17 up a tree for them, I didn't have gifts for them. And it's
18 so hard to tell children, little ones, that you don't have
19 it. And it -- and I still haven't been able to afford that.
20 I am the -- I'm making it now, with the subsidized rent, but
21 I don't have extra money. There's no extra money.

22 THE COURT: Any other questions?

23 MR. MUNSHI: That's all we have, Your Honor.

24 Thank you.

25 THE COURT: Are you ready -- it's a little -- it's

1 actually twelve o'clock. We'll recess one hour for lunch.
2 Again, I caution you not to discuss the case even among
3 yourselves. Do not allow anyone to discuss it with you.
4 Have no conversation with anyone you see in the courtroom on
5 any subject. With that, we will recess until one o'clock.
6 The jury is excused.

7 THE COURT OFFICER: All rise.

8 (Luncheon recess taken at 12:01 p.m.)

9 (Afternoon Session Continues in Separate Transcript)

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CERTIFICATION

We certify that the foregoing is a correct transcript from the electronic sound recording of the proceedings in the above-entitled matter to the best of our knowledge and ability.

Transcriptionists: Cathryn Renzoni and Coleen Rand



Jul
July 17, 2018

Coleen Rand, AAERT Cert. No. 341

Certified Court Transcriptionist

For Advanced Transcription

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